

RICHARD WORLEY V. DEPUTY DANNY LAWRENCE, ET AL.

Richard Worley - 08/14/2018

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF MISSISSIPPI
2 JACKSON DIVISION

3 RICHARD WORLEY PLAINTIFF

4 V. CAUSE NO. 4:17-cv-193 SA/JMV
5

6 DEPUTY DANNY LAWRENCE, Individually and in his
7 Official Capacity as a Deputy of the Grenada
County Sheriff's Office; DEPUTY BRYAN GRIFFITH,
8 Individually and in his Official Capacity as a
Deputy of the Grenada County Sheriff's Office;
DEPUTY RANDY SWEAT, Individually and in his
9 Official Capacity as a Deputy of the Grenada
County Sheriff's Office; DEPUTY TIM GHOLSTON,
10 Individually and in his Official Capacity as a
Deputy of the Grenada County Sheriff's Office;
DEPUTY DONNY WILLIS, Individually and in his
11 Official Capacity as a Deputy of the Grenada
County Sheriff's Office; JOHN DOES I-X,
12 Individually and in his Official Capacity as a
Deputy of the Grenada County Sheriff's Office;
SHERIFF ALTON STRIDER, Individually and in his
13 Official Capacity as a Sheriff of the Grenada
County Sheriff's Office; GRENADA COUNTY,
14 MISSISSIPPI DEFENDANTS
15

16 *****
17

18 DEPOSITION OF RICHARD WORLEY
19 *****

20 DATE: TUESDAY, AUGUST 14, 2018
21 PLACE: GORE, KILPATRICK & DAMBRINO
2000 GATEWAY, SUITE 160
JACKSON, MISSISSIPPI
22 TIME: 10:37 a.m.
23

24 BETHANY CAMMACK
Certified Shorthand Reporter
25 Mississippi CSR No. 1526

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1	RICHARD WORLEY, 2 having been first duly sworn, 3 was examined and testified as follows: 4 EXAMINATION	Page 5
5	BY MS. GRIFFITH:	
6	Q. Mr. Worley, I'm Mary McKay Griffith. I	
7	introduced myself earlier. And you just sat	
8	through Ms. Kitchens' deposition. Is that correct?	
9	A. Yes, I did.	
10	Q. And you're going to have to speak up so	
11	everybody --	
12	A. Yes, I did.	
13	Q. Okay. So just everyone can hear you. So	
14	you kind of understand how it goes. You know, I'll	
15	ask you questions, and just try not to speak over	
16	each other. If you need a break, just let me know.	
17	Could you state your full name?	
18	A. Richard Gordan Worley.	
19	Q. And how old are you?	
20	A. I'm 42 years old.	
21	Q. And have you lived in Grenada your entire	
22	life?	
23	A. No, I haven't.	
24	Q. Okay. So where were you born?	
25	A. Winona, Mississippi.	

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<p>1 Q. And your adult life, where all have you 2 lived?</p> <p>3 A. My adult life? I have lived in Grenada, 4 Mississippi. I have lived in Bristol, Tennessee. 5 And I have lived in Murray, Kentucky.</p> <p>6 Q. And what is your current address?</p> <p>7 A. 123 Savannah Lane.</p> <p>8 Q. And how long have you lived there?</p> <p>9 A. I have lived there four years.</p> <p>10 Q. And who do you live with?</p> <p>11 A. Barbara Kitchens.</p> <p>12 Q. And is that your girlfriend?</p> <p>13 A. Yes, it is.</p> <p>14 Q. And y'all have never been married?</p> <p>15 A. No, we haven't.</p> <p>16 Q. Have you ever been married?</p> <p>17 A. Yes, I have.</p> <p>18 Q. Who have you been married to?</p> <p>19 A. Stephanie Morsalla, at the age of 19. 20 Murray, Kentucky. My first wife.</p> <p>21 Q. And how long were y'all married?</p> <p>22 A. Two years.</p> <p>23 Q. Did you have any children?</p> <p>24 A. No, we didn't.</p> <p>25 Q. Why did you divorce?</p>	<p>1 A. She was a -- cheated.</p> <p>2 Q. Okay. Did you ever get married after 3 that?</p> <p>4 A. Yes, I did.</p> <p>5 Q. To who?</p> <p>6 A. Tara Todd.</p> <p>7 Q. And what years were y'all married?</p> <p>8 A. We were married from 2006 through 2011.</p> <p>9 Q. And where did y'all live?</p> <p>10 A. Murray, Kentucky.</p> <p>11 Q. And why did y'all divorce?</p> <p>12 A. Medical problems with her.</p> <p>13 Q. What sort of medical problems?</p> <p>14 A. She had a shunt in her head that released 15 fluid from the brain. There was a major fault in 16 her surgery at Vanderbilt, and she was no longer 17 the same.</p> <p>18 Q. Okay.</p> <p>19 A. She went from an adult to a kid.</p> <p>20 Q. Did y'all have any children together?</p> <p>21 A. Yes, we did.</p> <p>22 Q. Who are they?</p> <p>23 A. Emlea Grace Worley and Richard Gordan 24 Worley, Jr.</p> <p>25 Q. And where do your children live now?</p>
Page 8	Page 9
<p>1 A. My boy is with Shannon Powers, and my girl 2 is with her aunt, Mitzi Mason, in Benton, Kentucky.</p> <p>3 Q. So when's the last time you've seen your 4 daughter?</p> <p>5 A. It's been ten years.</p> <p>6 Q. And why is that?</p> <p>7 A. Well, you could say that -- my fault. My 8 drinking. My alcoholism in the past.</p> <p>9 Q. And how old is your daughter?</p> <p>10 A. My daughter's 11. My boy is ten. They 11 were born nine months apart.</p> <p>12 Q. So you said you have contact with your 13 son. Is that correct?</p> <p>14 A. No.</p> <p>15 Q. Where does he live?</p> <p>16 A. He lives with Shannon Powers.</p> <p>17 Q. Who is Shannon Powers?</p> <p>18 A. He's a parole officer for Benton County, 19 Kentucky. Marshall County. Benton, city.</p> <p>20 Q. So did Shannon Powers adopt him?</p> <p>21 A. No.</p> <p>22 Q. So how did your ten-year-old son end up 23 with Shannon Powers?</p> <p>24 A. At the time that Tara ended up with -- in 25 her surgery, I was incarcerated. The babies didn't</p>	<p>1 have anywhere to go. Instead of the state, I 2 signed papers to have family. They're a great 3 family. I know them. Good people. And that was 4 the best place. Besides going to state custody, I 5 wanted them to be with family.</p> <p>6 Q. So Shannon Powers is your family?</p> <p>7 A. Well, in-laws. He's a great guy.</p> <p>8 Q. Okay. So have you ever met your children?</p> <p>9 A. Yes. My -- when they were infants.</p> <p>10 Q. Okay. And you said you were incarcerated 11 when they had to go somewhere besides your ex-wife.</p> <p>12 Why were you incarcerated?</p> <p>13 A. I was incarcerated for -- it was a wanton 14 endangerment.</p> <p>15 Q. A what endangerment?</p> <p>16 A. Wanton.</p> <p>17 Q. What does that mean?</p> <p>18 A. Back in -- it's wanton. It's like 19 threatening, wanton.</p> <p>20 MR. CLARKE: Wanton?</p> <p>21 THE WITNESS: Wanton. It's not a --</p> <p>22 it's not a charge now, but it was then. It's -- if 23 you're wanton. . .</p> <p>24 MS. GRIFFITH CONTINUED:</p> <p>25 Q. Okay. So what did you do wrong?</p>

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<p>1 A. Well, me and my stepfather --</p> <p>2 (MS. KITCHENS ENTERED ROOM.)</p> <p>3 MS. GRIFFITH: Can we just take a</p> <p>4 quick break?</p> <p>5 (OFF THE RECORD.)</p> <p>6 MS. GRIFFITH CONTINUED:</p> <p>7 Q. As you were saying -- you were trying to</p> <p>8 describe to me why you were incarcerated. What did</p> <p>9 you do wrong?</p> <p>10 A. I threatened my stepfather.</p> <p>11 Q. You threatened your stepfather?</p> <p>12 A. (Nods head affirmatively.)</p> <p>13 Q. And who was your stepfather?</p> <p>14 A. That was Jerry Eldridge.</p> <p>15 Q. In what manner did you threaten him?</p> <p>16 A. Went to the house -- drove from Grenada,</p> <p>17 Mississippi. At the current time, I was living</p> <p>18 here. Went to his house and told him if he ever</p> <p>19 put his hands on my mother -- she's in a</p> <p>20 wheelchair -- that there was going to be problems.</p> <p>21 And he put my mother in the hospital. He was an</p> <p>22 alcoholic. And he assaulted my mother physically,</p> <p>23 beat her in a wheelchair.</p> <p>24 And her son had stole some medication from</p> <p>25 her, and I -- my oldest sister -- my little sister</p>	<p>Page 10</p> <p>1 and big sister told me about it, and I had went to</p> <p>2 Murray, Callaway County, to confront him over this.</p> <p>3 First, I went to see my mother in the hospital.</p> <p>4 Q. So how long were you incarcerated in</p> <p>5 Kentucky?</p> <p>6 A. Three months. And then the judge ordered</p> <p>7 me -- he wanted me out of jail. I had worked</p> <p>8 for -- anyway. . .</p> <p>9 Q. I think you need to speak up.</p> <p>10 A. It's a commonwealth -- it's a</p> <p>11 commonwealth. It works a little different. The</p> <p>12 judge has power. And I had done some work --</p> <p>13 Mr. Phil Hazel, is the jailer, and they -- after 90</p> <p>14 days, I was released and set on probation.</p> <p>15 Q. Okay. So what brought you to Grenada,</p> <p>16 Mississippi?</p> <p>17 A. My father's side of the family are from</p> <p>18 the Delta. They were raised and born to my father</p> <p>19 which I have. There's 14 in the family. And they</p> <p>20 were raised in the Delta. My father's people are</p> <p>21 from here. That's what brought me here. My</p> <p>22 father's buried here in Grenada in the cemetery.</p> <p>23 Q. So do you currently have any relatives</p> <p>24 here in Grenada?</p> <p>25 A. Yes, I do.</p>
<p>1 Q. And who are they?</p> <p>2 A. I have got Mr. Worley. That is my uncle's</p> <p>3 son. He runs Worley's Septic Service. I have my</p> <p>4 aunt and a uncle, Geraldine Newman and Johnny</p> <p>5 Newman, live at Geeslin Corner. I have a brother.</p> <p>6 I have a brother, Ralph Worley, that -- at the</p> <p>7 barbershop, Ralph's Clipper Cuts and More, at the</p> <p>8 Defenbaugh building. I have numerous family from</p> <p>9 this area.</p> <p>10 Q. And how long have you been here --</p> <p>11 A. I have --</p> <p>12 Q. -- this time?</p> <p>13 A. Four years.</p> <p>14 Q. I'm sorry. And I think I asked you that.</p> <p>15 And what do you do for a living?</p> <p>16 A. Painting contractor. Remodeling. That's</p> <p>17 my profession.</p> <p>18 Q. And when is the last time that you've</p> <p>19 actually had a job painting?</p> <p>20 A. It's been right at over a year.</p> <p>21 Q. And why is that?</p> <p>22 A. The reason being is, I feel safest at</p> <p>23 home. It's like my -- when I'm at -- I been kind</p> <p>24 of -- you know, I feel safest at home. I don't</p> <p>25 want to go anywhere. I don't get out. I used to</p>	<p>Page 12</p> <p>1 love to get out and -- if I'd see a house that was,</p> <p>2 you know, mildew on it or it needed -- the paint</p> <p>3 was falling off of it, I was the type of person</p> <p>4 that I would get out and give a card -- knock on</p> <p>5 the door and give them a card.</p> <p>6 If I seen a driveway that was -- needed</p> <p>7 sealed, I would get out and -- I would mostly</p> <p>8 solicit my work and pass out cards. And I've done</p> <p>9 the Whitaker house on Margin Street from top to</p> <p>10 bottom.</p> <p>11 I just -- I love to meet people. I used</p> <p>12 to be a very people person. I love to associate</p> <p>13 with people. I like to please people. I'm a</p> <p>14 people pleaser. And I just -- now I just -- I</p> <p>15 don't have any drive, any -- it's like, you know, I</p> <p>16 just don't have any momentum. I'm kind of -- I'm</p> <p>17 worried. I'm kind of -- I feel safest at home.</p> <p>18 Q. And what are you worried about?</p> <p>19 A. I'm worried about being threatened,</p> <p>20 being -- I'm worried about -- when the law gets</p> <p>21 behind me now, I clam up. I'll just. . . I'm</p> <p>22 emotionally -- I just don't -- you know, I just --</p> <p>23 I just don't want to get out. I can't explain it.</p> <p>24 I just. . .</p> <p>25 Q. So what do you do to make money?</p>

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<p style="text-align: right;">Page 14</p> <p>1 A. Basically, my brother has been taking care 2 of me.</p> <p>3 Q. And what's his name?</p> <p>4 A. Ralph.</p> <p>5 Q. What does Ralph do again?</p> <p>6 A. He runs the barbershop here in town. And 7 his wife, she's an RN. She's a registered nurse. 8 She works for Batesville Hospital.</p> <p>9 Q. Do they live near you?</p> <p>10 A. Yes, they do.</p> <p>11 Q. Do they live in your neighborhood?</p> <p>12 A. They live a mile away, Camp McCain 13 Estates.</p> <p>14 COURT REPORTER: I'm sorry. What was 15 that?</p> <p>16 THE WITNESS: Camp McCain Estates.</p> <p>17 MS. GRIFFITH CONTINUED:</p> <p>18 Q. You mentioned that you had a drinking 19 problem.</p> <p>20 A. Yes.</p> <p>21 Q. Is that correct?</p> <p>22 A. Yes, I did.</p> <p>23 Q. And are you -- you say "I did." Do you no 24 longer have a drinking problem?</p> <p>25 A. I'll have this problem -- the way I</p>	<p style="text-align: right;">Page 15</p> <p>1 understand from AA meetings, I'll have this problem 2 until the day I die. There's no recovery for my 3 problem.</p> <p>4 Q. Well, as I understand it --</p> <p>5 A. I just take it one day at a time.</p> <p>6 Q. Well, Ms. Kitchens reported that you're 7 still drinking, though.</p> <p>8 A. And I -- yes, I do. But I used to be more 9 of a -- I was a drinker. When I say "drink," I 10 used to drink heavily. When I would get off work, 11 I drank as hard as I worked. I would -- I'll put 12 it that way. But now it's like one beer will last 13 me for hours. I just -- I don't -- I just don't 14 ever -- I don't know, I just don't want to be --</p> <p>15 Q. So how often do you go to AA meetings?</p> <p>16 A. I do a lot of mine. I've got my book. I 17 have done 90 meetings in 90 days. I have -- but 18 now I just read my book and read my Bible, and 19 that's all. I don't go to any meetings here in 20 Grenada.</p> <p>21 Q. You don't go to any?</p> <p>22 A. No. I haven't in the past year.</p> <p>23 Q. Why is that?</p> <p>24 A. I just -- I just read my Bible and read my 25 AA book.</p>
<p style="text-align: right;">Page 16</p> <p>1 Q. So did you ever have problems with the law 2 when you were drinking?</p> <p>3 A. Oh, yes, I have. I have. I'm not proud 4 of anything I've done in the past. I had a problem 5 with alcohol. And with me, it -- now, alcohol, it 6 was like -- one reason, it was like Dr. Jekyll and 7 Mr. Hyde. Alcohol affects some people differently. 8 Some people can drink and can tolerate it. 9 Apparently I cannot. My record shows it from my 10 arrests over the alcohol.</p> <p>11 Q. You've got a stack.</p> <p>12 A. Yes, I do.</p> <p>13 Q. So would you become violent with the 14 officers?</p> <p>15 A. No, I never have became violent with any 16 officers. No, I haven't.</p> <p>17 Q. Never?</p> <p>18 A. Never became violent with officers. I 19 respect the law. I have an uncle that has been a 20 deputy sheriff for 40 years in Rosedale, 21 Mississippi. Dosey Woods.</p> <p>22 Q. So you never called an African-American 23 deputy a nigger?</p> <p>24 A. Yes, I have.</p> <p>25 Q. Why would you have done that?</p>	<p style="text-align: right;">Page 17</p> <p>1 A. I done that after the second time I stood 2 up from being hit in the face with my hands behind 3 my back. Let me rephrase that. I didn't actually 4 call him a nigger. I did not say that. What I 5 actually said is -- I was honest -- "A black man 6 would not hit a man while he's handcuffed behind 7 his back, but a nigger will every time."</p> <p>8 And I said that out of rage of being 9 knocked to the floor for the second time with my 10 hands behind my back. And that's -- and it was out 11 of rage. I was upset, and it was not meant as any 12 type of racial slur.</p> <p>13 Q. So are you referencing the incident that 14 you filed the lawsuit about that we're here about 15 today? Is that correct?</p> <p>16 A. Do what?</p> <p>17 Q. Are you talking about the December the 18 23rd, 2016 arrest?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. So did you say to any of the officers on 21 that day that "I'm going to kill you"?</p> <p>22 A. No, ma'am. No, ma'am. I swear. No, 23 ma'am.</p> <p>24 Q. Did you ever threaten Danny Lawrence's 25 family that evening?</p>

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<p>1 A. No, I did not.</p> <p>2 Q. Have you ever threatened any officer's 3 family?</p> <p>4 A. No, I haven't.</p> <p>5 Q. So you never threatened Sonja Willis's 6 family?</p> <p>7 A. No, I have not. I have told her -- she 8 did not have a warrant. We did not call her to my 9 house. I had asked her if she would leave my 10 property.</p> <p>11 Q. So have you ever called her a nigger?</p> <p>12 A. I called her a negro.</p> <p>13 Q. In what context?</p> <p>14 A. "Get off my property, negro."</p> <p>15 Q. So on the date of the incident, 12/23/16, 16 did you say to one of the officers, "Suck my penis 17 before you die, nigger"?</p> <p>18 A. No. Absolutely not.</p> <p>19 Q. So you didn't tell him to suck your dick?</p> <p>20 A. No, ma'am.</p> <p>21 Q. Well, and you heard your -- you heard 22 Barbara testify earlier when we asked her if you 23 had ever hit her. Have you ever hit her?</p> <p>24 A. No. I have pushed her away from me. 25 Barbara has her issues.</p>	<p>Page 18</p> <p>1 Q. Well, what are you talking about?</p> <p>2 A. She's on -- she's a bipolar or 3 schizophrenic. She's -- and that's all I know.</p> <p>4 I'm not a psychiatrist and I'm not a psychologist.</p> <p>5 I deal with Barbara because I love Barbara. I been 6 knowing Barbara since she was -- we were kids. Her 7 grandfather and my daddy were best friends. He run 8 a body shop in Horn Lake, Mississippi. I been 9 knowing her all of my life, her entire family.</p> <p>10 Q. So has she ever fallen off an ATV?</p> <p>11 A. She has flipped an ATV. She ran a big 600 12 up a barbed wire fence. And it went straight up 13 the fence and rolled over on top of her. And we 14 had to pull it -- me and Mr. Cobbs had to get the 15 four-wheeler off of her. It would have killed her. 16 It was one of the biggest Bombardiers they make.</p> <p>17 Q. So is Barbara compliant on taking her 18 medication?</p> <p>19 A. That's an issue.</p> <p>20 Q. Well, you heard her testify that she is.</p> <p>21 MR. CLARKE: Object to the form.</p> <p>22 THE WITNESS: Well, I cannot stand 23 there and shove these pills down her throat.</p> <p>24 MS. GRIFFITH CONTINUED:</p> <p>25 Q. I understand. So have you ever beat</p>
<p>1 Barbara with a belt?</p> <p>2 A. No.</p> <p>3 Q. Have you ever bit her?</p> <p>4 A. Bit her?</p> <p>5 Q. Yes.</p> <p>6 A. No. Bit her?</p> <p>7 Q. And I'm going to show you these 8 photographs. What are these -- there's a copy for 9 you.</p> <p>10 A. Yes.</p> <p>11 Q. What are those photographs of?</p> <p>12 A. Those are the four-wheeler incident when 13 she -- on the Bombardier.</p> <p>14 Q. But you know she told the deputies at 15 first that you beat her?</p> <p>16 A. I don't know why she would say anything 17 like that.</p> <p>18 Q. So you're denying beating her?</p> <p>19 A. Yes. It didn't happen. Period.</p> <p>20 Q. So you don't have any idea why she would 21 have told the deputies that you beat her?</p> <p>22 A. No, I don't.</p> <p>23 Q. Have you ever beat anybody else?</p> <p>24 A. No.</p> <p>25 Q. Tell me about -- it's my understanding</p>	<p>Page 20</p> <p>1 that Barbara is currently on paper for meth 2 charges. Have you ever had any involvement in 3 meth?</p> <p>4 A. Never. Never had a drug charge. I have 5 had a charge of marijuana.</p> <p>6 Q. Well, that's a drug charge.</p> <p>7 A. Yeah, that's drug. Yes, I have.</p> <p>8 Marijuana. Never had -- and that was on my 9 birthday. I had tried it. That's the only drug 10 charge I've ever had in my entire life.</p> <p>11 Q. So have you ever been indicted for rape?</p> <p>12 A. Yes, I have.</p> <p>13 Q. And tell me the circumstances of that.</p> <p>14 A. The circumstances, in the short term, I 15 was accused of rape. A woman scorned. I led a 16 woman on for seven months, sending me money, and 17 she started her way up to Kentucky, and I told her 18 I didn't want nothing to do with her. And 19 basically she told me that "You'll pay. You'll 20 pay. I'm going to make you pay."</p> <p>21 And I got arrested shortly -- seven months 22 later in Kentucky and was extradited here. Sat in 23 jail nine months. Never got an indict- -- never 24 got a -- what do you call it? A -- I was just 25 held. I never really -- I never got an indictment.</p>

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<p style="text-align: right;">Page 22</p> <p>1 What I got was, they told me to go to 2 court, and I didn't never even see a judge. I 3 actually filed a lawsuit against this in Memphis, 4 but the attorney was too busy at the time. He was 5 -- case overload, is what he told me. 6 But sat nine months, and, "Richard" -- put 7 me in a little ole room up there and said, "Please 8 sign these papers. We're so sorry we have locked 9 you up. We know you have not done anything. If 10 you will" --</p> <p>11 Q. Richard who?</p> <p>12 A. -- "sign these papers, we're going to 13 release you." And me, I'd been there nine months, 14 I signed the papers. And I never seen a judge. 15 The only judge I ever seen was Jimmy Tallant at 16 district court. I never seen nobody else. And 17 they told me to sign the papers. I didn't even 18 read them. I was just so happy I was -- Lord, I 19 wanted to get back home.</p> <p>20 Q. So is that the only time you've been 21 accused of rape?</p> <p>22 A. That, and then LeAnna's, my -- Barbara's 23 daughter accused me of rape. And that was all 24 because -- basically because of this past 25 circumstance. Her father and I have never</p>	<p style="text-align: right;">Page 23</p> <p>1 gee-hawed, and we got into a -- you could say an 2 argument on the phone, me and him. And then that's 3 when these allegations arrived. 4 And then we went to court then, and the 5 judge -- I never even had an attorney. Judge Jimmy 6 Tallant got us all in court, got to questioning, 7 and it was just -- he told her, "If I ever catch 8 you lying on this man again, if I ever catch you in 9 this courtroom again, you'll be the one go to 10 jail." 11 And he scolded LeAnna for -- her and her 12 father. He scolded both of them in court. And he 13 looked at me and he said, "Richard, you're free to 14 leave." And we left. 15 And that's -- and she's apologized a 16 thousand times for what she's done, but I'll just 17 -- after she done that, you know, I just -- I just 18 don't understand.</p> <p>19 Q. So have you ever been accused of molesting 20 or raping a child?</p> <p>21 A. No.</p> <p>22 Q. Did you bite your uncle's ear off?</p> <p>23 A. No. I don't have but one uncle. That was 24 Uncle Troy. No.</p> <p>25 Q. So there wasn't a newspaper article to</p>
<p style="text-align: right;">Page 24</p> <p>1 that effect?</p> <p>2 A. My uncle? No.</p> <p>3 Q. Have you bit someone before?</p> <p>4 A. I was 19 years old, and I was at my 5 uncle's house. I didn't bite my uncle. I had a 6 man attack me at 19 years old. He was 45 -- 42. 7 And he'd had me down and was hitting me in the 8 face. And for my defense, all I could do was bite 9 him. 10 And I don't recall biting his ear off. I 11 think -- not his ear off. I think it was a little 12 -- I think I might have reached up and got -- when 13 I got him off, I think I bit a little piece of his 14 ear right there. Not his ear off, no, ma'am.</p> <p>15 Q. So who was that?</p> <p>16 A. I believe his name -- Bubba Winters.</p> <p>17 Q. So is this the same person as Calvin 18 Roach?</p> <p>19 A. No, no.</p> <p>20 Q. Did you bite Calvin Roach?</p> <p>21 A. Yes, I did.</p> <p>22 Q. When was that?</p> <p>23 A. That was 2016.</p> <p>24 Q. And why did you bite him?</p> <p>25 A. He hit me seven to eight times with a --</p>	<p style="text-align: right;">Page 25</p> <p>1 they call it a flapjack. It's a lead stick, 2 basically. And he was beating me down. And when 3 he got on top of me, he went to rare back and just 4 beating me all in the head and face with this 5 flapjack. 6 And the only way I felt that I was going 7 to -- I felt he was going to kill me. And to get 8 him off of me, I bit him. I was kind of in a 9 blackout. You know, I was so dazed, I was just 10 trying to get the man off of me.</p> <p>11 Q. Were you drunk?</p> <p>12 A. I was -- I had been drinking.</p> <p>13 Q. So had you been drinking the other time 14 that you bit Bubba?</p> <p>15 A. No. I was sober.</p> <p>16 Q. So have you ever bit anyone else?</p> <p>17 A. Back in high school. Had a 24-year-old 18 man -- I was like 15, and he was 24. And we was in 19 a tobacco -- cutting tobacco. And he jumped on me 20 in the field and got me down, and then I bit him. 21 Bit him on the arm to get him off of me.</p> <p>22 Q. So have you ever tried to bite any Grenada 23 County sheriff's deputies?</p> <p>24 A. No, ma'am.</p> <p>25 Q. I think I mentioned before Barbara's</p>

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<p style="text-align: right;">Page 26</p> <p>1 deposition the people that I represent in the case 2 that you've filed against them. And the first one 3 is Danny Lawrence. Can you tell me why you've sued 4 Danny Lawrence?</p> <p>5 A. Well, police officers are supposedly 6 supposed to protect and serve. I was standing 7 there being struck not one, not two, not three, but 8 repeatedly. He stood there and watched this, and 9 did not intervene.</p> <p>10 Q. And where are you saying that you were -- 11 where were you physically when you are saying that 12 you were struck?</p> <p>13 A. I was standing at the booking desk at the 14 Grenada County jail.</p> <p>15 Q. Okay. So when you were in the booking -- 16 at the booking desk, where was Danny Lawrence?</p> <p>17 A. Standing right beside me. He was standing 18 on my left.</p> <p>19 Q. Are you saying that --</p> <p>20 A. With my hands cuffed behind my back. And 21 he was kind of standing kind of behind me to my 22 left.</p> <p>23 Q. So you're just basically saying he failed 24 to stop someone from hitting you?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 27</p> <p>1 Q. What are your claims against Tim Gholston? 2 A. Tim? Tim Gholston, nothing. Tim Gholston 3 was never there. Tim Gholston was never at the 4 jail. Tim Gholston was at the lake when I got 5 arrested. Tim Gholston is -- lives across the 6 street from my brother. He's a nice man. I'm 7 telling you, he's a super great guy.</p> <p>8 Q. So then why are you suing him if he wasn't 9 there?</p> <p>10 A. Tim Gholston --</p> <p>11 MR. CLARKE: Hang on a second. I'm 12 going to -- I'm going to object. Let me ask 13 Mr. Worley to go out, because this involves 14 privileged information. The information -- we 15 didn't have public records stuff at the time. We 16 requested public records. We didn't get them. If 17 you look at my complaint, we say we were going to 18 --</p> <p>19 MS. GRIFFITH: I saw your footnote.</p> <p>20 MR. CLARKE: Yeah. We're going to -- 21 until we can find out who was there and whatever -- 22 once that happens, we intend to let out a number of 23 deputies once we confirm the people that were 24 there.</p> <p>25 MS. GRIFFITH: But based on what he</p>
<p style="text-align: right;">Page 28</p> <p>1 just said, are you saying you want to let him out 2 now? I mean. . .</p> <p>3 MR. CLARKE: Well, I'm pretty sure we 4 are.</p> <p>5 MS. GRIFFITH: Okay.</p> <p>6 MR. CLARKE: Yeah.</p> <p>7 MS. GRIFFITH: Well, I mean, I've 8 just got to ask him these questions.</p> <p>9 MR. CLARKE: No, no, no. I 10 understand. If you saw the footnote --</p> <p>11 MS. GRIFFITH: I saw the footnote.</p> <p>12 MR. CLARKE: Mr. Worley, stop. This 13 is me talking to the lawyer.</p> <p>14 We are going to pare it down to probably 15 Griffin and Lawrence.</p> <p>16 MS. GRIFFITH: Okay.</p> <p>17 MR. CLARKE: Once I take the 18 depositions and confirm. He was having trouble 19 identifying who was there. He knows Lawrence 20 brought him there.</p> <p>21 MS. GRIFFITH: Okay.</p> <p>22 MR. CLARKE: So that's probably 23 what's going to happen. I'd like to do it by 24 consent, but until we -- we didn't get very many 25 records.</p>	<p style="text-align: right;">Page 29</p> <p>1 MS. GRIFFITH: I understand.</p> <p>2 MS. GRIFFITH CONTINUED:</p> <p>3 Q. Okay. So was Randy Sweat -- was he 4 present when this incident occurred? Do you know 5 him?</p> <p>6 A. No, ma'am, he was not present, either, 7 until after the fact, after this is -- had 8 occurred.</p> <p>9 COURT REPORTER: After this is what?</p> <p>10 THE WITNESS: After the -- it had 11 occurred.</p> <p>12 MS. GRIFFITH CONTINUED:</p> <p>13 Q. Okay. What about Donny Willis?</p> <p>14 A. Donny Willis was not present.</p> <p>15 Q. Do you even know if he was working that 16 day?</p> <p>17 A. No, I don't.</p> <p>18 Q. And I'll just submit to you, he was not.</p> <p>19 MR. CLARKE: Right. And, look, 20 here's what happened. I was talking with Danny, 21 and he gave me a list of who was present.</p> <p>22 MS. GRIFFITH: Okay.</p> <p>23 MR. CLARKE: And those are all those 24 people. Because I was trying to get my public 25 records request done before the year came up. We</p>

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<p>1 had even called the -- you know, and this is why 2 certain people are brought in. 3 It's more -- it's not his information. 4 It's based on what -- and that's why I put that 5 footnote in my complaint, is, until we can identify 6 and confirm who was particularly there, we'll let 7 the other people out. But he gave me that list of 8 people that were potentially present -- 9 MS. GRIFFITH: Oh, I understand. 10 MR. CLARKE: -- on that day. So we 11 intend, after this round of depositions -- that's 12 why some mine, when you want to take depositions 13 Thursday, some of these are going to be very quick. 14 MS. GRIFFITH: Oh, well, good. Then 15 maybe we can move some of them up. 16 MR. CLARKE: If we can get them, we 17 may get through more tomorrow. 18 MS. GRIFFITH: Oh, yeah, we could 19 probably do that. 20 MR. CLARKE: Okay. 21 MS. GRIFFITH CONTINUED: 22 Q. So tell me, was Sheriff Strider present 23 when this incident occurred? 24 A. No, ma'am. 25 Q. Okay. So what are your claims against</p>	<p>1 him? 2 MR. CLARKE: I'm going to object to 3 that on the basis of attorney-client privilege. 4 The claims are based on my information. I wrote 5 the complaint. 6 MS. GRIFFITH: Well, I understand 7 that. But he's the plaintiff, so -- this is my 8 only time to talk to him, and I'd like to know why 9 he's suing Sheriff Strider. 10 THE WITNESS: It's his department. 11 MS. GRIFFITH CONTINUED: 12 Q. Okay. Did you -- 13 A. He's in authority. He supposedly had 14 these men trained. The behavior that I received 15 from them was -- was not called for. 16 Q. And I'll just remind you to speak up so 17 she can hear you. 18 A. It was not -- it was not called for, the 19 way I was treated. 20 Q. Did you ever speak to him about this 21 incident? 22 A. No, I haven't. 23 Q. Now, where had you -- on 12/23, when this 24 incident occurred, '16, where had you been? 25 A. That morning, I was at the house. Been</p>
<p>1 basically nowhere. Been there at the house. I had 2 got up. We -- routine. I got up and -- you know, 3 it was Christmas. It was fixing to be the 24th and 4 25th. I asked Barb if she wanted to ride over to 5 her mother's to wish her, you know, a merry 6 Christmas. And -- 7 Q. Did you have anything to drink before you 8 went? 9 A. Around 12:30, 1:00, I'd had one cup of 10 wine, and then I drank it, and I drank another 11 little ole cup of wine. It was (indicating) a cup 12 of wine. But it was -- I didn't -- I was planning 13 on coming -- visiting with them and coming home and 14 then making me a toddies and enjoying my -- working 15 around the house and shop and, you know, just 16 enjoying my Christmas. You know, enjoying my off 17 time. It was -- you know, off of work. 18 Q. So y'all went over to her mom's house. Is 19 that correct? 20 A. Yes, ma'am. Went to her mother's, and I 21 went to get out. Her mom came out, "How you doing, 22 Richard?" Everything was fine. 23 I said, "Well, y'all have a merry 24 Christmas. You going to cook the turkey?" And we 25 talked there a minute, and the next thing I know,</p>	<p>1 her son Jimmy, upset -- I haven't worked him. I 2 had a big job going on, and I told him I didn't 3 need him. 4 And he felt that -- being, you know, 5 Jimmy, like -- he was like -- I didn't need him 6 because he does not have the skills that I needed. 7 I was working way up in the air, heights. I did 8 not need him. He was upset because I didn't hire 9 him. Basically that was it. 10 And he started hollering, "If you don't 11 leave, I'm going to call the law." 12 I said, "Well, I'm leaving." I said, 13 "But, Nancy, what's going on?" 14 Her mother just shook her head and said, 15 "It's all right, Worley." 16 So I got in the car to leave. I said, 17 "Barb, let's go." 18 Barb said, "We can't leave the scene of an 19 incident." 20 I said, "There's been no incident." 21 She said, "Well, we can't leave the scene 22 of an incident." 23 I said, "What incident?" 24 I just sat in the car. The deputies 25 pulled up. Danny walked up to the passenger car</p>

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<p>1 and said, "Richard, what's going on?"</p> <p>2 I said -- I put my hands up, I said, "I</p> <p>3 have no clue." I said, "You're going to have to go</p> <p>4 ask Jimmy."</p> <p>5 He went in, talked a few minutes. When he</p> <p>6 came out, he says, "Richard, y'all are free to --</p> <p>7 y'all go on home." That was it.</p> <p>8 Q. Well, did you go home?</p> <p>9 A. Started home. And when you cross the</p> <p>10 levee there at Grenada, I had to use the bathroom.</p> <p>11 That's where I pulled off, down the levee. The</p> <p>12 bathroom's right to the right. Sure enough, lo and</p> <p>13 behold, the law pulled in, the law did, and looked</p> <p>14 in the back glass. And I told them I needed to use</p> <p>15 the bathroom, and he said, "Go on."</p> <p>16 Well, I went in there to use the bathroom.</p> <p>17 I went in there and peed. Came out, and Mr. Danny</p> <p>18 Lawrence was standing by the passenger side of the</p> <p>19 car door when I went to get in. He said, "Worley,</p> <p>20 I thought y'all was going home."</p> <p>21 I said, "You know, I was. I had to use</p> <p>22 the bathroom." I said, "You see my fishing poles</p> <p>23 in the back." I said, "I was going to do some</p> <p>24 fishing."</p> <p>25 He said, "How much have you had to drink?"</p>	<p>1 I said, "I've had a couple cups of wine."</p> <p>2 He said, "Well, I don't want you going</p> <p>3 fishing. I want you to go home."</p> <p>4 I said, "No, Danny, I'm going to go</p> <p>5 fishing." I said, "I've got a license." I said,</p> <p>6 "You see I ain't drunk."</p> <p>7 He said, "No, just go on home."</p> <p>8 I said, "Danny, I can't go fishing?" I</p> <p>9 think that was the third time.</p> <p>10 He said, "Well, that's it. I'm just going</p> <p>11 to -- I'm going to carry you to jail."</p> <p>12 I said, "Oh, Danny, don't carry me to</p> <p>13 jail. I ain't done nothing." I said, "I'll go on</p> <p>14 home, then."</p> <p>15 I went to open up the door. He said, "No,</p> <p>16 I'm going to carry you on to jail." And he kind of</p> <p>17 -- he grabbed my hand. When he grabbed my hand, I</p> <p>18 said, "Go on, carry me to jail." I said, "What are</p> <p>19 you going to carry me for?"</p> <p>20 That's when he said, "I'm going to arrest</p> <p>21 you for public drunk."</p> <p>22 I said, "All right."</p> <p>23 Q. So you really think I should believe that</p> <p>24 you were that calm and had that demeanor about you</p> <p>25 when you were talking to him?</p>
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<p>1 MR. CLARKE: Object to the form.</p> <p>2 THE WITNESS: I sure did. That's the</p> <p>3 God's honest truth. God as my witness, that's the</p> <p>4 truth.</p> <p>5 MS. GRIFFITH CONTINUED:</p> <p>6 Q. Did you have any beer in your car?</p> <p>7 A. No.</p> <p>8 Q. So did you calmly get into his vehicle?</p> <p>9 A. Handcuffed behind the back. And the way</p> <p>10 it is -- it's not a car. It's actually like a SUV.</p> <p>11 It's off the ground. I put my one foot here, and</p> <p>12 when I turned my body to sit in the seat, turned my</p> <p>13 body, and he went to -- he slammed the door. And I</p> <p>14 didn't quite have my feet in the door, and he</p> <p>15 slammed the feet -- my feet got hung right there in</p> <p>16 that door when he slammed them.</p> <p>17 And the only time I got loud is, I told</p> <p>18 him, "Don't slam my feet. Don't slam the door on</p> <p>19 my feet again, Danny." That's what I done. Put my</p> <p>20 feet in the truck, and he shut the door and got in.</p> <p>21 We proceeded to jail.</p> <p>22 Q. So did you do any kicking or screaming?</p> <p>23 A. None whatsoever.</p> <p>24 Q. Do you think it was just an accident that</p> <p>25 he did that with your ankle?</p>	<p>1 A. Who knows?</p> <p>2 Q. But that's not part of this lawsuit. Is</p> <p>3 that what you're saying?</p> <p>4 A. Right. That's -- I'm just explaining what</p> <p>5 happened.</p> <p>6 Q. But you're not claiming that he</p> <p>7 intentionally --</p> <p>8 A. No, I'm not.</p> <p>9 Q. -- hurt your ankle?</p> <p>10 A. No, I'm not.</p> <p>11 Q. So did Tim Gholston also come out there</p> <p>12 when you were being arrested?</p> <p>13 A. Yes, Tim was there. He was present.</p> <p>14 Q. Okay. And did you talk to Tim or say</p> <p>15 anything to him?</p> <p>16 A. Tim just kind of shook his head. I said,</p> <p>17 "Do you believe this, Tim?" He just shook his</p> <p>18 head. He just kind of . . .</p> <p>19 Q. So did you have any -- did you talk to</p> <p>20 Danny Lawrence when he was driving you to jail?</p> <p>21 A. Yes, I did.</p> <p>22 Q. What did y'all talk about?</p> <p>23 A. On the way to jail, all I -- I told him, I</p> <p>24 said, "You know, Danny, I think it's mighty sorry</p> <p>25 you've got a niece and a nephew here, and you</p>

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<p style="text-align: right;">Page 38</p> <p>1 ain't -- you don't -- you haven't even give them a 2 birthday card, Christmas card. Father's passed 3 away." I said, "You could do something to help 4 these kids. They need guidance, even somebody to 5 talk to. Do something. Don't just throw them out 6 of their aunt's life."</p> <p>7 I mean, I don't think that's right when 8 they don't have any family. They don't have any 9 family but Big Sonny's sister, which is their aunt, 10 and Danny. That's it. And they don't have any 11 contact with these kids. I thought that was -- I 12 thought that was kind of sad, to be honest.</p> <p>13 Q. Well, who are you to tell him that?</p> <p>14 A. Well, that's just the way I felt. Who am 15 I -- that's the way I felt.</p> <p>16 Q. You don't even have any contact with your 17 ten- or 11-year-old children.</p> <p>18 MR. CLARKE: Object to the form. 19 That's argumentative.</p> <p>20 THE WITNESS: I pay my child support. 21 I do support my children.</p> <p>22 MS. GRIFFITH CONTINUED:</p> <p>23 Q. How do you pay your child support if you 24 don't have a job?</p> <p>25 A. Well, I'm a little behind right now, but I</p>	<p style="text-align: right;">Page 39</p> <p>1 will get it caught up.</p> <p>2 Q. So how far behind are you?</p> <p>3 A. I'm -- \$5,000.</p> <p>4 Q. So when is the last time you paid 5 anything?</p> <p>6 A. It's been a few years.</p> <p>7 Q. And that goes through Kentucky?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So once y'all were on your way, you 10 had this conversation with Danny, told him what you 11 thought. What happened after that?</p> <p>12 A. He was on his cell phone. He was talking 13 to somebody. I couldn't quite make what he was 14 saying because he was really quiet.</p> <p>15 Q. Okay. And then he takes you into -- I 16 guess he drove into the sally port?</p> <p>17 A. Correct.</p> <p>18 Q. And what happened after that?</p> <p>19 A. Well, went into sally port, and he gets 20 out, walks around, opens the door. I step out, and 21 we walk in the jail. Nobody's there but me and 22 Danny Lawrence.</p> <p>23 Q. So did you fall in the sally port?</p> <p>24 A. No, ma'am. None whatsoever.</p> <p>25 Q. Was the sally port wet?</p>
<p style="text-align: right;">Page 40</p> <p>1 A. No, ma'am. None whatsoever.</p> <p>2 Q. So nothing happened in the sally port?</p> <p>3 A. None whatsoever. Not a thing. Put it on 4 God's word.</p> <p>5 Q. So did you try to run from the officers or 6 kick them?</p> <p>7 A. No, ma'am. None whatsoever.</p> <p>8 Q. And who was in the sally port besides you 9 and Danny Lawrence?</p> <p>10 A. No one else.</p> <p>11 Q. So what happened once you got in the 12 booking area?</p> <p>13 A. Got into the booking area, I was standing 14 there, he was to the left kind of behind me.</p> <p>15 Q. And you're talking about Danny?</p> <p>16 A. Yes. Yes, ma'am. And nobody was -- 17 nobody -- just me and him. And it was kind of odd 18 there was not a -- generally you got a guard that 19 sits at the desk. A guard that sits at the desk, 20 you know, to process you in. You have another 21 guard that's going to take your belt and, you know, 22 unhandcuff you and stuff and -- you know, they take 23 control. Nobody was there.</p> <p>24 What happened next, the doors open, and 25 this black deputy -- I have never seen this man in</p>	<p style="text-align: right;">Page 41</p> <p>1 my life -- was walking through the sally port door 2 there and walking toward me. And I made the 3 comment, I said, "The donuts are pretty good up at 4 the donut shack." Because was he kind of -- you 5 know, I just had a -- I sensed something wrong, and 6 I wanted to get his attention.</p> <p>7 But he never said a word. He never -- he 8 kind of had his head down and he was walking toward 9 me. Never said a word. Never stopped. When he 10 got up to me, when he hit me, I hit the ground.</p> <p>11 Q. And what did you hurt when you hit the 12 ground?</p> <p>13 A. When he hit me, he -- he come around this 14 -- he hit me dead in the mouth. When he hit me in 15 the mouth, it busted my mouth and nose, and I went 16 straight to the ground. But being me, stubborn, I 17 rolled -- when I hit the ground, I kind of rolled 18 -- I was handcuffed behind my back. When I hit the 19 ground, I rolled around and jumped straight back to 20 my feet and told him, "My mother hits harder than 21 that."</p> <p>22 And that's when he hit me again. And this 23 time when he hit me, I went straight to the ground 24 again. And I got back up, and that's when I told 25 him that a black man would not hit a man in</p>

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<p style="text-align: right;">Page 42</p> <p>1 handcuffs, but a nigger will every time. 2 And he reared back -- when he hit me, I 3 put my head back, and he hit me right there on the 4 chin and busted my chin wide open. Hit the ground 5 and started back up again, and that's when he put 6 his -- that's when he stomped me.</p> <p>7 Q. What do you mean, he stomped you?</p> <p>8 A. What I mean, he took his boots and he -- I 9 went to turn around, which I was -- and he stomped 10 me on my head. Head facing this way. That's where 11 the blood is coming out of my ear. And I don't 12 remember too much after that. I remember the nurse 13 screaming. I remember that. "Get off of 14 Mr. Worley."</p> <p>15 Q. What nurse are you talking about?</p> <p>16 A. Ms. Bibbs.</p> <p>17 Q. And then what happened?</p> <p>18 A. I remember her pulling me away. I mean, I 19 woke up, got to, and she said, "Mr. Worley, stand 20 up." And she had pulled me from the -- this little 21 lady here, four foot tall, pulled me from here to 22 the door outside right there, on the other side of 23 this door.</p> <p>24 And she said -- and by that time, I was 25 kind of getting coherent. She said, "Can you stand</p>	<p style="text-align: right;">Page 43</p> <p>1 up?" 2 I said, "Yes, ma'am." 3 She helped me up and she got me in the 4 nurse's room there. And she said, "Oh, my God, 5 we've got to get you to the emergency room." And 6 that's when she got out there and got on to Danny 7 and them. That little woman, she was fired up. 8 She said, "Y'all are going to get Mr. Worley to the 9 hospital now. I'm going to call an ambulance." 10 And Danny spoke up and said, "No, I'll 11 carry Richard to the hospital." 12 And I was like, "No, I don't want to go, 13 Ms. Bibbs. They might take me off and kill me." I 14 said, "I don't want to go." 15 She said, "Don't" -- I said -- that's 16 exactly what I told her, too. I didn't want to go 17 with Danny. Here I'd done been nearly stomped to 18 death and beat with my hands behind my back. I 19 didn't want -- I was scared. 20 She said, "I promise you, if you'll go 21 with -- they're not going to harm you anymore." 22 Those were the words out of her mouth. 23 And I said, "If you promise." She -- then 24 that's when the other deputy showed up. I guess he 25 came from the sheriff's office. He's an older</p>
<p style="text-align: right;">Page 44</p> <p>1 deputy. I guess that was who you-all are calling 2 Sweat. He's gray-headed. 3 I got in Danny's -- back in Danny's SUV, 4 and they took me to the hospital. And that's 5 when -- that's what happened.</p> <p>6 Q. So were any other deputies at the hospital 7 besides Danny Lawrence and Deputy Sweat?</p> <p>8 A. Yes, ma'am. I don't -- you know, you-all 9 are saying Griffin. Mr. Griffin. The black deputy 10 that was -- when I was going in, he was like this. 11 He came up there to see the extent of my injuries. 12 He was standing at the -- all -- the door. And I 13 did -- told him how sorry he was, the way he beat 14 me. 15 And Danny and Mr. Sweat said, "Come on, 16 Richard. It's going to be all right. Come on." 17 And I just -- because it was through a 18 door, and I just kind of yelled at him that "That 19 was sorry, the way you done me." And I was -- you 20 know, I was upset the way I got beat. That's the 21 truth.</p> <p>22 Q. So what treatment did you get at the 23 hospital?</p> <p>24 A. At the hospital, they -- the doctor sewed 25 me up. My front tooth was knocked back. They</p>	<p style="text-align: right;">Page 45</p> <p>1 didn't actually break it out, thank God, because I 2 love my teeth. I got good teeth. And I'm real -- 3 I was ticky about my teeth. And it chipped my 4 tooth. It got chipped right there and knocked 5 back. 6 I went to a dentist. They told me -- 7 x-rayed it and done all that, and told me, he said, 8 "Richard, it's not broke." He said, "What they 9 done, they knocked the root and stuff loose." And 10 it pushed back. And he put some -- like put some 11 glue on it to keep it, you know, kind of 12 stabilized. He said it would take root back and 13 stay.</p> <p>14 Q. So do you have any problems with that 15 tooth now?</p> <p>16 A. I got a dead feeling in it, like a -- you 17 know, a -- it ain't a numbness. I don't know how 18 to express -- it's like a -- you know, when I eat, 19 it's just like just a dead -- deadish feeling under 20 the gum.</p> <p>21 Q. So you had to get stitches in your chin?</p> <p>22 A. I don't recall how many. I think it's 22.</p> <p>23 Q. They didn't even give you pain medicine 24 for that, did they?</p> <p>25 A. No, ma'am.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. You didn't want it, did you?</p> <p>2 A. I don't take pills. I don't. I take an 3 aspirin.</p> <p>4 Q. So besides you claiming that your tooth 5 was injured and you had these stitches in your 6 chin, did you have any other injuries?</p> <p>7 A. It's just my -- it's like -- I can't 8 explain it. You know, it's just like when I was 9 beat like that, I don't -- my main injury is, I 10 feel -- you know, I don't want to get out in the 11 public. I don't want to get -- I used to like to 12 ride and go fishing and do things and -- but now 13 I'm afraid.</p> <p>14 I'm afraid. I've heard talk around town. 15 Deputy sheriffs talked to my brother up there that 16 Strider is not going to play fair. I'm just 17 scared. You know, I'm scared. I don't want to. . . 18 . I'm scared of getting hurt.</p> <p>19 Q. So have you had to go to a psychiatrist?</p> <p>20 A. My plans is, after this deposition, I'm 21 going to Kentucky. The only reason I've stuck 22 around this long is to get this here done, and I'm 23 moving back to Murray.</p> <p>24 Q. So have you started packing?</p> <p>25 A. I've got -- I've started selling. I been</p>	<p style="text-align: right;">Page 47</p> <p>1 selling a lot of stuff. And that's another reason 2 -- I been selling a lot of stuff. You're saying 3 how am I making a living. I'm selling a lot of my 4 belongings. I done sold a boat. I done sold a 5 camper. I done sold three four-wheelers of mine. 6 I've sold a lot of stuff to pay bills and to 7 maintain.</p> <p>8 Q. So besides your chin being injured, and 9 you claim your tooth, did you have any other 10 injuries besides you saying you just don't get out 11 in the public anymore?</p> <p>12 A. My tooth and my dignity, my pride. It's 13 all just. . . just. . . I can't explain it. It's 14 more of a psychological thing, I guess. I don't 15 know. I don't know. I just -- that just took the 16 drive out of me. It took -- after that, it just -- 17 I can't. . .</p> <p>18 Q. And, again, if you'll speak up so the 19 court reporter --</p> <p>20 A. After that beating, I just -- I'm just -- 21 I'm different. I just think different. I do 22 things differently. I just want to stay at home. 23 I don't -- you know, basically I don't want to be 24 around nobody.</p> <p>25 Q. So when you were in that booking area, did</p>
<p style="text-align: right;">Page 48</p> <p>1 you ever talk to a booking officer?</p> <p>2 A. Never did. And that was strange.</p> <p>3 Q. So once you went back to Marilyn Bibbs' 4 office, did you see anyone in there besides 5 Marilyn?</p> <p>6 A. From the hospital, when I got back? Yes, 7 there was a lady at the booking desk then, and 8 booked me in. Took my picture.</p> <p>9 Q. Okay. So they took you back to the jail 10 after they took you to the hospital. Is that what 11 you're saying?</p> <p>12 A. Yes, ma'am.</p> <p>13 Q. And at that point you were actually booked 14 in? Is that what you're saying?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. And do you know who booked you in?</p> <p>17 A. No, ma'am. It was a lady.</p> <p>18 Q. And how long did you stay in jail?</p> <p>19 A. I stayed in there that night. They did 20 not set me a bond whatsoever that night. They 21 didn't set me a bond that morning. I didn't get 22 out until late that afternoon.</p> <p>23 Q. And who got you out?</p> <p>24 A. Barbara.</p> <p>25 Q. And it's my understanding you followed up</p>	<p style="text-align: right;">Page 49</p> <p>1 with a dentist. Is that correct?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Did you follow up with any other type of 4 doctor?</p> <p>5 A. I got my stitches -- they took my stitches 6 out.</p> <p>7 Q. Do you have any outstanding medical bills?</p> <p>8 A. They've sent me some to the mailbox, 9 statements and stuff, you know, my medical bills. 10 I haven't paid any of them. I figured this would 11 go on my credit. And I could, you know, pay them 12 when I got financially able.</p> <p>13 Q. So do you know about how much you owe?</p> <p>14 A. Not today -- not -- no, ma'am. Not no 15 total or nothing, no, ma'am. I'd be lying if I 16 told you I did.</p> <p>17 MS. GRIFFITH: Do you want to take a 18 quick break?</p> <p>19 (OFF THE RECORD.)</p> <p>20 MS. GRIFFITH: I'd like to mark as 21 Exhibit 1 to his deposition the photographs of 22 Ms. Kitchens.</p> <p>23 (EXHIBIT 1 WAS MARKED FOR THE RECORD.)</p> <p>24 MS. GRIFFITH CONTINUED:</p> <p>25 Q. Have you ever been to rehab?</p>

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	Page 50	Page 51
1	A. Yes, I have.	1 A. Yes, I have.
2	Q. And when was that?	2 Q. Have you ever been convicted?
3	A. That was back in 2004. 2004. The Fuller	3 A. No, ma'am, I haven't.
4	Center in Mayfield, Kentucky.	4 Q. What are your felony convictions?
5	Q. Was that court ordered?	5 A. The wanton endangerment.
6	A. Court ordered.	6 Q. And that's it?
7	Q. And how long did you have to go?	7 A. And I got back behind -- see, Kentucky has
8	A. Ninety days treatment.	8 changed their laws on the child support issue that
9	Q. And do you have any misdemeanor	9 we discussed earlier. I know here in the state of
10	convictions?	10 Mississippi, they're more severe. But they were
11	A. Yes, I do.	11 severe also in Kentucky, but they have changed
12	Q. And can you tell me about those?	12 their laws. It's a civil matter now. That's
13	A. Yes. I have numerous DUIs. I've had --	13 basically the way they do it.
14	like I said, I was a alcoholic. I would drink and	14 Q. So have you ever been arrested since
15	drive. I went to the bars a lot. I was -- I've	15 December the 23rd of 2016?
16	had simple assaults. I was -- like I said, my	16 A. No, I haven't.
17	behavior when I was drinking, I've done some --	17 Q. How much did you weigh then?
18	made some bad choices under the influence of	18 A. I weighed then probably 170.
19	alcohol that I would not have made if I was sober.	19 Q. And how tall are you?
20	And simple assaults and DUIs is basically my	20 A. Five eight, five seven.
21	record.	21 Q. And how much do you weigh now?
22	Q. So have you ever been accused of	22 A. I'm probably 165.
23	assaulting a police officer or a police deputy?	23 Q. And I'm going to hand you -- I'm going to
24	A. Accused?	24 be talking about... .
25	Q. Yes.	25 MR. CLARKE: You got Bates numbers?
	Page 52	Page 53
1	You're starting at No. 1?	1 MR. CLARKE: We'll stipulate to his
2	MS. GRIFFITH: Number 1 to No. 484.	2 record.
3	And I'd like to mark this as Exhibit 2 to your	3 MS. GRIFFITH: Well, I know that you
4	deposition.	4 will, but I'd like to go through a few of them.
5	(EXHIBIT 2 WAS MARKED FOR THE RECORD.)	5 MR. CLARKE: Certainly.
6	MR. CLARKE: Is this just the whole	6 MS. GRIFFITH CONTINUED:
7	set of the 26(a)? The 26(a) disclosures, is that	7 Q. If you would look at page 6. And you
8	the whole --	8 might want to take that rubber band off. It might
9	MS. GRIFFITH: Yeah, I think it is.	9 be just a little bit easier. If you would flip
10	And I'm going to go through a good many of these.	10 them, so just to not to get them out of order.
11	I don't know if y'all need a lunch break.	11 A. Yes.
12	MR. CLARKE: I don't. I'd rather --	12 MR. CLARKE: Yeah. Go like this, so
13	I've got to get home tonight.	13 this one will go like that. Put that file there.
14	MS. GRIFFITH: All right.	14 MS. GRIFFITH CONTINUED:
15	(OFF THE RECORD.)	15 Q. Yeah. And you might just want to put that
16	MS. GRIFFITH CONTINUED:	16 one on top, just so we can keep them in order.
17	Q. Mr. Worley, you probably saw Ms. Kitchens	17 It looks like -- I'll give you a second to
18	when I asked her about some documents. Basically	18 read this.
19	there's a number at the bottom right hand of the	19 A. (Reviewing document.)
20	document. Do you see that No. 1?	20 Q. This was an incident that the Grenada
21	A. Yes, ma'am.	21 County Sheriff's Department responded to your home
22	Q. And I'm certainly not going to ask you	22 on March the 8th of 2017. Is that correct?
23	about all of these pages, but I am going to ask you	23 A. Ma'am?
24	about some of them, because you do seem to have	24 Q. Do you know anything about --
25	quite a lengthy criminal history.	25 A. No, ma'am.

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1 Q. -- this incident? 2 A. No, ma'am, nothing whatsoever. 3 Q. Who are your current neighbors, 4 Mr. Worley? 5 A. My current neighbor is Mr. Ludulf. Runs 6 Ludulf's Small Engine Repair. 7 Q. Is that your only neighbor right now? 8 A. Yes. Mr. Rick has moved. Mr. Rick lived 9 on one side, and I had -- Mr. Ludulf lives on the 10 other, and I'm kind of -- I'm in the middle. And 11 nobody in front of me. 12 Q. I'm going to ask you to turn to page 10. 13 A. (Reviewing document.) 14 Q. This looks like a January 12th, 2017 15 incident when the authorities went out to your 16 house. Do you have a pit bull? 17 A. Yes, I do. I have two. 18 Q. And do you know anything about who this 19 neighbor was who -- 20 A. That would have been Mr. Rick, apparently. 21 I don't know for sure, but I would say Mr. Rick. I 22 don't know. I do remember the written warning 23 taped on -- one of my -- see, I keep my dogs -- 24 they're on a chain, with collar. And they don't -- 25 you know, I never let my dogs run loose.	Page 54	1 But apparently Sue had got off. And when 2 I came in -- I was at work all that day. I had 3 been gone. I was not there just five minutes 4 prior. I had been working. When I got off, that's 5 when I saw -- I said, "There's a note taped on the 6 door," and I read it. 7 And sure enough, Sue was off the chain. 8 She had a tendency -- she won't get off now because 9 I put a -- I had to put a choke collar on her also, 10 because she had a tendency -- she would like put 11 her head down, take her paws, and she would back up 12 with her head down. 13 I have never sicced my pit bull -- my dogs 14 -- I don't want my dogs fighting. They're big 15 babies, is all my dogs are, just big ole babies. 16 Q. So did you and this Mr. Rick get along? 17 A. Yeah. Yes. He -- actually, he's repaired 18 my -- I had a Ford truck, and me and him, we done 19 some work on it. 20 Q. So why do you think he would have told -- 21 A. I don't know if it was Mr. -- I don't know 22 if it was Mr. Rick. I'm just -- I don't know who 23 it was. I'm just saying that's my closest 24 neighbor. 25 Q. Well, whoever your neighbor -- this	Page 55
1 neighbor was -- 2 A. Complained about -- 3 Q. -- apparently told -- just let me finish 4 my question -- told them that "Worley told his 5 brown and white pit bull to 'sic em'" and that it 6 was an ongoing problem with you threatening your 7 neighbor. 8 A. I don't know. 9 Q. Okay. 10 A. I was never told of this. This is the 11 first time I was ever told that. First time I've 12 ever seen this piece of paper in my life. 13 Q. All right. If you'll turn to page 14. 14 A. (Reviewing document.) 15 Q. And this is the narrative of the incident 16 that began 12/23/16, is it not? 17 A. Narrative? 18 Q. Well, it's just an incident report by 19 Danny Lawrence. Is that correct? 20 A. Appears to be, yes. 21 Q. Do you remember Mr. Lawrence telling y'all 22 to go straight home? 23 A. No, he did not. He told us we're free to 24 leave. 25 Q. Okay. Did you also see in that statement	Page 56	1 that it said you appeared to be drunk? 2 A. Yes, I see that. 3 Q. And are you disputing that? 4 A. I sure am. 5 Q. If you'll turn to page 21. 6 A. (Reviewing document.) 7 Q. Do you remember when Sonja Willis came to 8 your home on 9/29 of 2016? 9 A. Yes, I do. 10 Q. And are you disputing that you threw hot 11 water -- I mean, hot coffee on Barbara? 12 A. I did not throw hot coffee on Barbara. 13 Q. Well, it says that she tried to show her 14 where the coffee was, because it was still wet from 15 the coffee on her back. Are you disputing that you 16 threw it? 17 A. Yes. I didn't throw hot coffee on 18 Barbara. No, I did not. 19 Q. Did you call Sonja Willis and Barbara that 20 day a whore? 21 A. No. 22 Q. So did Barbara just make this up? 23 A. I don't recall Barbara ever saying that. 24 Q. What do you recall Barbara saying? 25 A. Nothing of that nature. We had had an	Page 57

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<p style="text-align: right;">Page 58</p> <p>1 argument, and her -- I asked Sonja why she arrived, 2 who called her, and she said her mother -- 3 Barbara's mother had called, and that's how she got 4 dispatched out there.</p> <p>5 Q. So were y'all still fighting when she got 6 there?</p> <p>7 A. We were arguing. All I told her, if 8 Barbara wanted to act the way she was acting, not 9 take her medicine, that, "Barbara, you need to 10 leave." Basically I said that, you know, "I own 11 this here. This is my property. This is my 12 trailer. If you want to, you know, act like you're 13 acting, throwing things, just" -- and just not 14 taking her medicine, she -- her issues and stuff, I 15 just told her, "You've got to leave. I can't take 16 it."</p> <p>17 Q. Did Barbara ever --</p> <p>18 A. That was it.</p> <p>19 Q. I'm sorry for interrupting you. Did 20 Barbara ever get physical with you?</p> <p>21 A. Not physical, no. She has a tendency to 22 throw things, break things. But not physical, no.</p> <p>23 Q. If you'll look at page 31.</p> <p>24 A. (Reviewing document.) Yes.</p> <p>25 Q. Can you tell me about this June the 1st,</p>	<p style="text-align: right;">Page 59</p> <p>1 2005 incident? Is this the incident where you 2 claim that Calvin Roach was trying to beat you with 3 a -- some sort of tool?</p> <p>4 A. I don't know exactly what you call it. 5 It's a -- they say it's a flapjack. It a piece of 6 solid lead pipe, is what it is, but it's flat. 7 It's called a flapjack or something. I don't know. 8 You want me to explain what happened this day?</p> <p>9 Q. I think you already have. Is that not the 10 incident where you ended up biting him?</p> <p>11 A. Well --</p> <p>12 Q. Or is that a different incident?</p> <p>13 A. Well, what had happened is, the deputies 14 were at -- earlier that day, the deputies -- there 15 was like four deputies, an investigator. All of 16 them were at Mr. Roach's house.</p> <p>17 And a friend of mine that -- Jason Dodson 18 and Bill Ashmore, they were there. And I pulled in 19 and -- to see what was going on. And apparently 20 Mr. Roach here had stolen some power tools, and 21 they were in his shed.</p> <p>22 And basically what happened is, the deputy 23 sheriff looked at me and said, "Richard, I do not 24 have a warrant to open up that little door there to 25 his shed." He said, "Go over there and open the</p>
<p style="text-align: right;">Page 60</p> <p>1 door for me."</p> <p>2 I went to the truck and got a flathead 3 screwdriver, and I was intoxicated, and I opened 4 the door. And the deputy sheriff told me to leave. 5 He said, "Thank you. Leave, Richard. You can 6 leave now." Apparently they got all the tools. 7 And Tina was living at this residence. 8 That's Tyler's, my cousin's wife. And he wanted to 9 go over there that evening and talk to his wife, 10 get his wife home or whatnot. When I had pulled 11 up, that's when he come out with the flapjack. 12 "I'm going to kill you, whoop you," and this, that 13 and the other. 14 And I told him, I said, "I just done what 15 the deputies told me to do." 16 And he come off that -- off the steps, and 17 when he come off the steps, I was inside the car. 18 I opened the door, and when I stepped out, that's 19 when he started wailing me with it. That's what 20 happened.</p> <p>21 Q. All right. If you'll turn to page 34.</p> <p>22 A. (Reviewing document.)</p> <p>23 Q. I think this is the April 29th, 2016 24 incident basically where you kicked Barbara out 25 again. I mean, did that happen quite often?</p>	<p style="text-align: right;">Page 61</p> <p>1 A. When she's not taking her medi- -- it 2 just -- I get too much to handle, and I need just a 3 break, seems like. No, it's not quite -- it's not 4 quite often. I mean, like, a lot of times I will 5 call her mother and ask her mom, "Please come get 6 Barb. She's just too much for me." I mean, 7 it's . . .</p> <p>8 Q. So it also a combination of Barbara 9 drinking and doing drugs?</p> <p>10 A. Barbara has -- I've never seen Barbara -- 11 one time in her -- since me and her have been 12 together, I've seen her drink one time. She's not 13 a drinker. Drugs? She got around a friend of hers 14 and introduced her -- she's never done drugs, that 15 I know of.</p> <p>16 Never stole anything. I've run a business 17 for years, and, you know, the quickest thing that 18 would ruin you is a thief. Nobody's going to let 19 you into their house knowing you're stealing. No, 20 ma'am.</p> <p>21 She's never -- she got around the wrong 22 person, and this is just a -- she tried it, and 23 apparently she just -- it done something to her. 24 It changed her. And thank God, she's getting help.</p> <p>25 Q. All right. If you'll turn to page 41.</p>

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Page 62	Page 63
1 A. (Reviewing document.) All right.	1 A. Mary? That is -- Mary is my first
2 Q. Can you tell me about this incident that	2 cousin's wife.
3 occurred at your residence 11/26 of 2015?	3 Q. So have you ever got in an argument with
4 A. Yes, ma'am. I was under the influence of	4 her?
5 alcohol, and apparently my behavior was uncalled	5 A. Ms. Mary? No. Not Ms. Mary.
6 for.	6 Q. Have you ever made threats against her or
7 Q. So you don't deny that you were yelling	7 her children?
8 and telling the deputies to get off your property?	8 A. Ms. Mary? No, not -- no, never. Not
9 A. I do not deny that. Only thing I deny, I	9 Ms. Mary. Me and her -- we worked -- me and Thomas
10 wasn't throwing any rocks. I think the deputies	10 worked together. We run a business. That's who
11 arrested -- actually, it was Shane and Lamb --	11 was my partner before he passed away. No.
12 Shane and Barbara had got into it, and the law came	12 Q. If you'll turn to page 47. This incident
13 -- they was arguing with each other, and when law	13 report was written 11/1/2015. And as you'll see,
14 came, they arrested Shane.	14 it looks like Mary Worley went to the SO
15 I was kind of drinking. I was on Shane's	15 complaining that "Richard Worley made threats
16 -- wanted to be on his side, and I told them, "Just	16 against her and her children." Do you know
17 take me if you're going to take him. He ain't done	17 anything about this?
18 nothing. Just take me too." That's basically what	18 A. No, I don't. I'll have to ask Ms. Mary
19 I done.	19 about that. I don't know.
20 Q. And is he related to you?	20 Q. Has DHS ever been to your home?
21 A. Just -- no. He's just a friend of the --	21 A. DHS?
22 been knowing for years. He's a -- was married to	22 Q. Department of Human Services.
23 Penny Dahl, which is -- Flanagan. That's my	23 A. Over LeAnna, yes, they have.
24 kinfolks. That's -- was married to my cousin.	24 Q. If you'll turn to page 50.
25 Q. So who is Mary Worley?	25 A. (Reviewing document.)
Page 64	Page 65
1 Q. This narrative states that on July 28,	1 A. Yes, I have blacked out. Yes, I have.
2 2015, Nancy Moore stated that you and Barbara were	2 Many times. Drinking.
3 harassing her and her granddaughter. Do you know	3 Q. So perhaps some of these incidents could
4 anything about this incident?	4 have happened, but you just don't recall them?
5 MR. CLARKE: Object to the form.	5 A. I don't recall this. No, I don't. I
6 THE WITNESS: No, I don't.	6 mean, harassing, calling her -- Ms. Moore. Calling
7 COURT REPORTER: Did you object?	7 anybody and harassing them? I don't even have a
8 MR. CLARKE: I object to the form,	8 phone.
9 yeah. That's not what it says.	9 Q. So did you ever start a fight with Eddie
10 THE WITNESS: No.	10 Hatcher?
11 MS. GRIFFITH CONTINUED:	11 A. Well, no, I didn't start any fight. His
12 Q. Do you remember an incident where you	12 father came to my house, and what happened was, he
13 threatened to cut Bradley Hatcher's head off?	13 asked me something about some tires that had been
14 A. No.	14 cut like five or six years ago. And I told him the
15 Q. All right. Turn to page 57.	15 truth. I'd heard from a person that -- some black
16 A. (Reviewing document.)	16 folks -- that he was running up and down the road,
17 Q. It looks like from this Bates stamped	17 and they told him several times the kids were out
18 document, that Bradley Hatcher complained on	18 playing, to quit driving fast.
19 4/27/15 that you grabbed a shovel and threatened to	19 And I told him, "I believe that Kenny
20 cut his head off. Do you remember doing that?	20 Sykes and a few others might have cut your tires,
21 A. No.	21 because they said that, you know, you'd run 50 and
22 Q. Are you saying it didn't happen?	22 60 miles an hour through the neighborhood, wide
23 A. This didn't happen. No, it didn't.	23 open."
24 Q. I mean, are you the type person who gets	24 And he wanted me to go to the courthouse
25 drunk and passes out or blacks out?	25 and file papers. And I said, "Look, I don't have

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<p style="text-align: right;">Page 66</p> <p>1 anything to do with it." I said, "I'm not going 2 and sticking my nose in something." I said, "I was 3 in the state of Kentucky when your tires got 4 flattened, and I ain't got nothing to do with it." 5 And he got mad, and me and him -- he 6 jerked the shirt over my head and throwed me in a 7 ditch, and I got him off of me, and he went home. 8 That was it. And I wasn't under the influence.</p> <p>9 Q. All right. Look at page 67.</p> <p>10 A. (Reviewing document.) This is true. This 11 was on my birthday.</p> <p>12 Q. So your birthday's March the 12th of -- 13 well, I guess not 2015.</p> <p>14 A. This is true.</p> <p>15 Q. So is this the only -- this is -- you had 16 told me earlier about being arrested for marijuana 17 possession. Is this the only time you've been 18 arrested for marijuana possession?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. So that's not really your thing. It seems 21 like your thing was drinking.</p> <p>22 A. That was my -- my thing was drinking. I 23 come from an alco- -- my father was an alcoholic, 24 and I guess I -- my brother never -- he never -- 25 but neither one of my sisters -- now, I turned to</p>	<p style="text-align: right;">Page 67</p> <p>1 alcohol. 2 And I've done a lot of things, like I 3 said, guys, under the influence, when I was drunk, 4 under the influence of alcohol, that I shouldn't 5 have done. Apparently I acted, you know, ignorant 6 under the influence of alcohol.</p> <p>7 Q. Turn to page 73, please.</p> <p>8 A. (Reviewing document.) This is all false. 9 Got proved in court it was false, and throwed it 10 out. Yes, ma'am.</p> <p>11 Q. So you're saying this July the 8th, 2014 12 incident never happened?</p> <p>13 A. Yes. We went to Scenic Ridge Road, but 14 Sonny Kitchens came out beating on the car, her 15 son, and just acting just as wild as an Indian. It 16 was nothing -- nobody got out and did all that. 17 And all that -- that all got clarified in court.</p> <p>18 Q. So look at page 77, please.</p> <p>19 A. (Reviewing document.)</p> <p>20 Q. Is this the arrest report -- it's dated 21 8/18 of 2014 -- dealing with your stepdaughter or --</p> <p>22 A. No. That was Michelle Bennett. That was 23 the girl that I had been seeing. Michelle Bennett.</p> <p>24 Q. And you were extradited back from 25 Kentucky?</p>
<p style="text-align: right;">Page 68</p> <p>1 A. Yes. That's -- yes. Correct. That's 2 what I told you that -- when I never seen a judge. 3 They just apologized. As a matter of fact, a 4 person in the jail said, "Richard, the girl's 5 bragging that she had you put in here, and 6 everything you've done, it's all false. 7 "And my wife is going up there to -- don't 8 you have nothing to worry about. My wife's going 9 up there, and we've got her recorded," or something 10 about what she said, "that she's going to get her 11 money back one way or another." I don't know.</p> <p>12 Q. So that was an arrest from 2014, and 13 they're also stating the -- it happened in 2014.</p> <p>14 A. No, they're saying that it happened back 15 in two thousand and -- shoot, I think I was like 16 2006.</p> <p>17 Q. Well, if you'll look at page 81.</p> <p>18 A. No, this says I was arrested at Savannah 19 Lane. This was over -- I see now the address. I 20 correct myself. This was over LeAnna.</p> <p>21 Q. Okay. Got it.</p> <p>22 A. Yes, this is -- yes, this is what this is.</p> <p>23 Q. All right. Well, if you'll look at page 24 81, that might clear up my question.</p> <p>25 A. Now, this is over -- this is the --</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. That's the capital rape charge?</p> <p>2 A. Yes. They got . . .</p> <p>3 Q. And you spent nine months in jail for 4 that.</p> <p>5 A. Yes.</p> <p>6 Q. Is that correct?</p> <p>7 A. Yes. They had a -- I think it was a 8 million dollar bond I could not make.</p> <p>9 Q. And it looks like you also had a past 2003 10 arrest, May of 2003, that you were fighting at -- 11 this is on page 101 -- at Roy Worley's, I guess, 12 yard, maybe?</p> <p>13 MR. CLARKE: Did you say 101? 14 MS. GRIFFITH: Yes, 101. 15 THE WITNESS: 101? 16 MS. GRIFFITH CONTINUED:</p> <p>17 Q. Yes.</p> <p>18 A. Yeah, that's . . . Yes, this is true. That 19 really happened.</p> <p>20 Q. So, Mr. Worley, have you ever been -- I 21 understand you've been arrested on domestic 22 violence cases that involved Barbara. Have you 23 ever been convicted on any of those?</p> <p>24 A. No.</p> <p>25 Q. Are you stating here today that none of</p>

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<p>1 those happened?</p> <p>2 MR. CLARKE: Object to the form.</p> <p>3 THE WITNESS: We've argued. I try to 4 get away. I just walk away. The more I walk away 5 -- and sometimes I have to call the law to get 6 Barb -- I have to get somebody out there. I walk 7 away.</p> <p>8 And I'm all the time seeing somebody else 9 and all this. It's just one thing after another. 10 I don't know if you've ever had to deal with 11 anybody -- a jealous person before, but I have got 12 one that just loves me -- like Cousin Tom told me, 13 she loves me too much. That's the truth.</p> <p>14 And it gets to the extent I will -- I'll 15 call her mother. I'll have to get her mom to come 16 down and talk to her, calm her down. And a lot of 17 times -- most of the time when her mom comes down, 18 it all ends. Her mom talks to her, everything's 19 fine.</p> <p>20 And that's the way I handle it now. I 21 will. If she gets too rocky and gets to talking to 22 herself and gets out there, I will. I'll call her 23 mother to come down and talk to Barb.</p> <p>24 MS. GRIFFITH CONTINUED:</p> <p>25 Q. So since this incident that your complaint</p>	<p>Page 70</p> <p>1 is about, 12/23 of 2016, have you had to call law 2 enforcement to come out and help you with Barbara?</p> <p>3 A. No. I have had to call her mother.</p> <p>4 Q. Have you had any instances with your neighbors since 12/23 of 2016?</p> <p>5 A. Not that I'm -- I know if there is, it's 6 something secretive I don't know about. No.</p> <p>7 Mr. Ludulf, he came by the house the other day, and 8 we talked. Somebody in the neighborhood had stole 9 my lawnmower and somebody stole his pressure 10 washer. I had some things -- we both kind of want 11 to get some cameras up and see what's going on, 12 who's doing it. I mean, as far as I know. . .</p> <p>13 Q. So is Barbara still on meth?</p> <p>14 A. No.</p> <p>15 Q. Did she ever do it around you?</p> <p>16 A. She done it secretly. The way I found 17 out about it was through Connie, a friend of hers.</p> <p>18 Q. Connie? And what's her name?</p> <p>19 A. I'd hate to -- Connie Welch.</p> <p>20 Q. So did you see any other nurses or any other healthcare providers at -- let me just finish my question -- while you were at the jail during this 12/23/16 arrest besides Ms. Bibbs?</p> <p>21 A. There was another nurse -- after Ms. Bibbs</p>
<p>1 gets off duty, there's another nurse. I do not 2 recall her name.</p> <p>3 Q. Did you talk to her that evening?</p> <p>4 A. I talked to her -- I think she checked on 5 me not that evening, the next day. She come to 6 check on me and brought -- asked me if I needed any 7 ibuprofens.</p> <p>8 The only other thing I've got to have 9 checked is my ear. I have no hearing out of my 10 left ear. And I have not been financially able to 11 go to Memphis and see an ear doctor. But I can 12 close my -- I have no -- nothing. Since this 13 incident. I've got to have my hearing checked.</p> <p>14 But, anyway, I want to see what damage was 15 done, if I can get it repaired, hearing aid, or 16 something where I can hear out of my left ear. 17 That's one thing I do want.</p> <p>18 Q. So did you complain -- did your ear hurt after the incident?</p> <p>19 A. It was just a -- like a ringing. Just a 20 slight ringing in my ear. And then the ringing has 21 stopped, and it's just like deafness. It was 22 ringing, though, like a -- there was a ringing in 23 my ear. You could -- I could hear it in my head, 24 you know, but you just -- that's what it was. And</p>	<p>Page 72</p> <p>1 then the ringing went away, and now it's just -- 2 I'm deaf in it. I can't hear out of it.</p> <p>3 Q. Did you tell the emergency room doctor about problems with your ear?</p> <p>4 A. When I was there -- not that night, no, I 5 didn't. It was just ringing. I didn't think 6 nothing about it. I just thought -- I didn't 7 know what to -- there was just so much was going 8 through my mind at that point, I just -- ringing 9 ear, I didn't know.</p> <p>10 Q. Is there anything else that you can remember about the incident that you haven't told me about?</p> <p>11 MR. CLARKE: Object to the form.</p> <p>12 THE WITNESS: Not that I can think -- 13 recall.</p> <p>14 MS. GRIFFITH CONTINUED:</p> <p>15 Q. Well, with your arrest history in Grenada County, I mean, you knew most all of these officers that were there that night, correct?</p> <p>16 A. There was -- I know -- Tim Gholston's my 17 brother's neighbor. That's how I know him. And 18 then Danny, I think this is the first time I've 19 ever had any arrest from him at all, any type of 20 run-in like this. And I don't know Sweat</p>

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<p>1 personally. I don't know -- and I've never seen 2 Griffin.</p> <p>3 MS. GRIFFITH: I don't have any 4 further questions at this time. Thank you.</p> <p>5 THE WITNESS: Yes, ma'am.</p> <p>6 EXAMINATION</p> <p>7 BY MS. RILEY:</p> <p>8 Q. Mr. Worley, I've got a number of questions 9 here.</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. And I'll try not to double up on anything.</p> <p>12 My name is Katelyn Riley. I represent 13 Bryant Griffin in this lawsuit. When did you first 14 learn the name of Bryant Griffin?</p> <p>15 A. When -- the first time I learned his name, 16 because I had no clue to who this guy was 17 whatsoever, was the --</p> <p>18 MR. CLARKE: Hang on. We got a -- 19 can't ask him about attorney-client privileged -- 20 any information he got from me is privileged.</p> <p>21 MS. RILEY: I can ask him when he 22 first learned about it. That's not -- that's not 23 attorney-client privilege by any means.</p> <p>24 MR. CLARKE: That's true.</p> <p>25 MS. GRIFFITH CONTINUED:</p>	<p>Page 74</p> <p>1 Q. When did you -- when did you first learn 2 of Bryant Griffin?</p> <p>3 A. That would be. . . First learned was on 4 July the 3rd, I think. July the 3rd, 2018.</p> <p>5 Q. So after the incident that you filed this 6 lawsuit about?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. All right. And what do you know about 9 Mr. Griffin?</p> <p>10 A. I know that he's probably five nine. I 11 know that he's African-American. I know that he's 12 a little bit stockier built than I am. And I know 13 he can sure throw a punch.</p> <p>14 Q. What color is his hair?</p> <p>15 A. Black.</p> <p>16 Q. What kind of hairstyle does he have?</p> <p>17 A. It was just -- his hair at that time when 18 I seen him, it was just, you know, like straight. 19 It was straight up.</p> <p>20 Q. Would it be about your length, or --</p> <p>21 A. No. It was -- well, it was kind of, you 22 know -- no, it's not my length. It was kind of 23 slick and -- you know.</p> <p>24 Q. Would you say it was --</p> <p>25 A. It was very short.</p>
<p>1 Q. Very short?</p> <p>2 A. Yeah, short.</p> <p>3 Q. Would you say an inch?</p> <p>4 A. No, no, no. It was no inch.</p> <p>5 Q. Okay.</p> <p>6 A. It was short. I would say hardly -- 7 shoot, hardly no hair there, I know, right in the 8 front. He was slick.</p> <p>9 Q. Okay. When was the -- when do you first 10 remember -- on the date of the incident, on 11 December 23rd, when do you first remember 12 Mr. Griffin becoming involved?</p> <p>13 A. When he came in from the sally port.</p> <p>14 Q. What did he do?</p> <p>15 A. He walked straight toward me.</p> <p>16 Q. Okay. Who was in -- and you're saying 17 when he came in from the sally port, you're saying 18 he came into the booking area?</p> <p>19 A. Correct.</p> <p>20 Q. Who all was in the booking area?</p> <p>21 A. At that time, me, Danny, and Mr. Griffin 22 arrived.</p> <p>23 Q. Okay. There was nobody else?</p> <p>24 A. No one.</p> <p>25 Q. Okay. So there were no other arrestees in</p>	<p>Page 76</p> <p>1 the room?</p> <p>2 A. No, ma'am.</p> <p>3 Q. Was Nurse Bibbs in the room?</p> <p>4 A. No, ma'am.</p> <p>5 Q. Does Nurse Bibbs -- is her office -- does 6 it open up to the booking area?</p> <p>7 A. No, ma'am.</p> <p>8 Q. Okay. How many times do you claim that 9 Officer Griffin hit you?</p> <p>10 A. Hit me three times.</p> <p>11 Q. Okay. Where?</p> <p>12 A. The first time, dead in the mouth.</p> <p>13 Q. Okay.</p> <p>14 A. The second time, that's when I told him 15 that -- and he -- I got hit again. And the third 16 time, that's when he struck me on the chin.</p> <p>17 Q. When was the second time? What was that 18 -- where did he hit you the second time?</p> <p>19 A. In the face.</p> <p>20 Q. Where at on your face?</p> <p>21 A. On -- when -- first time in the mouth, 22 second time right in -- right beside -- right here.</p> <p>23 MS. RILEY: All right. Let the 24 record reflect that the deponent, Mr. Worley, is 25 putting his fist to his cheek.</p>

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<p>1 THE WITNESS: Yes, that would be 2 right side.</p> <p>3 MS. RILEY: His right --</p> <p>4 THE WITNESS: Yeah.</p> <p>5 MS. RILEY: His right cheek.</p> <p>6 MS. RILEY CONTINUED:</p> <p>7 Q. Do you agree?</p> <p>8 A. Yeah, right cheek.</p> <p>9 Q. Okay. And you said the third time was to 10 your chin?</p> <p>11 A. Yes. I tried to avoid that blow.</p> <p>12 Q. What did he hit you with? Just his fist?</p> <p>13 A. Appears to me -- if you seen a deputy 14 sheriff, he had like a leather -- it come up -- it 15 had a -- I know he had leather -- your fingers, you 16 can see your fingers, but it's a -- it's a black 17 glove. But your fingers go through it. And it's 18 like a -- it's black. Black leather glove, but 19 it's not a complete glove. It's not like I wear, 20 work gloves.</p> <p>21 Q. Like a fingerless glove?</p> <p>22 A. Yes.</p> <p>23 Q. All right. And you also mentioned earlier 24 that Deputy Griffin stomped you on your head. How 25 many times did he do that?</p>	<p>Page 78</p> <p>1 A. I recall just that one time.</p> <p>2 Q. How do you know it was only Deputy 3 Griffin?</p> <p>4 A. I was kind of incoherent. After the -- 5 after the --</p> <p>6 COURT REPORTER: I'm sorry?</p> <p>7 THE WITNESS: After the kick, I was 8 kind of incoherent.</p> <p>9 MS. RILEY CONTINUED:</p> <p>10 Q. You said after the kick. When were you 11 kicked?</p> <p>12 A. That third time I had fell down.</p> <p>13 Q. Okay. When you fell down -- how many 14 times did you fall down?</p> <p>15 A. I fell down -- got hit and fell down -- 16 the licks were the reason I fell down. Three 17 times.</p> <p>18 Q. Okay. And how did you get back up?</p> <p>19 A. I'm going to be honest with you, I rolled 20 and stood up. I mean, stood up. Literally rolled 21 and -- but I -- rolled to my feet and stood 22 straight up.</p> <p>23 Q. Did you jump up?</p> <p>24 A. More or less, yes.</p> <p>25 Q. When you would fall, would you fall on</p>
<p>1 your back?</p> <p>2 A. Well, when he struck me, I fell -- to my 3 -- the first lick I fell was to my side, to my left 4 side, and then I rolled and got up.</p> <p>5 Q. Okay. What about the second time you 6 fell?</p> <p>7 A. The second time, I can't really recall how 8 I got up. God helped me up on that one.</p> <p>9 Q. Now, the second time, how did you fall?</p> <p>10 A. I just --</p> <p>11 Q. Your side? Your back? Your stomach?</p> <p>12 A. I didn't -- I fell to my side, back. I 13 don't know exact --</p> <p>14 Q. Which one was it?</p> <p>15 A. I can't --</p> <p>16 Q. You don't remember, really, do you?</p> <p>17 A. After that first lick, I was just -- my 18 state of mind was getting up, trying -- I couldn't 19 defend myself or hold my hands in front me. So my 20 thing was, I didn't want to get caught on the 21 ground and get killed. My thing was to stand up. 22 That was my only thing I could think of, was, Get 23 back to your feet.</p> <p>24 Q. Okay. So I appreciate all that, but my 25 question was, that second time you fell, what part</p>	<p>Page 80</p> <p>1 of your body did you fall on? Your back, your 2 front, or your side, or you don't remember?</p> <p>3 A. I didn't fall on my back, because my back 4 of my head wasn't -- I didn't have no bad bruise on 5 my head. So that's the reason -- because my head 6 would have hit the concrete. I would have known 7 if I -- it had to been the side. Had to been on my 8 side.</p> <p>9 Q. It couldn't have been on your front?</p> <p>10 A. No. Because I facing him. Every time.</p> <p>11 Q. So there's no possible way that you fell 12 forward?</p> <p>13 A. I would've had to -- I would've had to 14 fall forward. And to fall forward, I would've had 15 to fell toward him. No way possible.</p> <p>16 Q. And you're absolutely certain, under oath, 17 that is how you fell?</p> <p>18 A. Under oath, so help me God.</p> <p>19 Q. But I thought you weren't coherent after 20 that first lick.</p> <p>21 A. I wasn't coherent after I got stomped.</p> <p>22 Q. Okay. Well --</p> <p>23 A. After the third lick and I was stomped, 24 that's when I wasn't coherent. I was coherent and 25 talking to the man -- each time that he hit me, I</p>

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1 stood up.	1 third lick, I fell, and when I -- I was very -- I
2 Q. Okay.	2 done took three. That was the third one. And he
3 A. I was coherent. I knew what I was	3 could hit pretty good. I was slow then. I started
4 receiving.	4 back up, but I never made it, when he stomped me.
5 Q. So that third time you were hit, how did	5 Q. Did you see him stomping you?
6 you fall?	6 A. I felt the stomp. He was the one doing
7 A. The third time, to the side again.	7 the attacking. For all reality, who else would
8 Q. Which side?	8 have stomped me? It wasn't --
9 A. My left.	9 Q. So you felt the stomp?
10 Q. Okay. Which side did you fall on the	10 A. Yes.
11 second time?	11 Q. But you didn't see the stomp?
12 A. That would have been my left. Then I	12 A. Just a black boot. He's the only one, you
13 rolled and jumped to my feet. I wish we had the	13 know -- boot, all I seen.
14 camera. It would have showed everything.	14 Q. None of the other officers were wearing
15 Q. Okay. So after the -- after the third	15 boots?
16 lick, you fell, and you jumped right back up at	16 A. I didn't pay no attention. The only one I
17 him, right?	17 seen was the one coming to my head.
18 A. After the what?	18 Q. So you don't know if the other officers in
19 Q. After the third hit, you fell down, right?	19 the room were wearing boots?
20 Isn't that what you said?	20 A. Officers -- there was -- there was two
21 A. Yes, I fell.	21 officers. There was Danny Lawrence and
22 Q. And then you jumped right back up?	22 Mr. Griffin. There was no other officers.
23 A. No.	23 Q. Okay.
24 Q. Okay. So --	24 A. There was one officer, and that was Danny.
25 A. I did not after the third. After the	25 Q. Okay. So who was Deputy Griffin?
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1 A. That's your other. There was two	1 A. Yes, ma'am.
2 officers, Griffin and Deputy Lawrence.	2 Q. Okay.
3 Q. Okay. What kinds of shoes were you	3 A. I don't even own a pair of cowboy boots.
4 wearing on the date of your arrest, on December	4 Q. I didn't say anything about any cowboy
5 23rd, 2016?	5 boots.
6 A. I was wearing work boots.	6 A. Leather sole. Now --
7 Q. All right. What kind of work boots?	7 Q. When do you wear your cowboy boots?
8 A. They're just leather -- leather work boots	8 A. I don't. I don't have any. But I read
9 with a slip-resistant sole for oil and -- they're	9 the depositions. In my paperwork, it's in there.
10 work boots. They're slip-resistant. They're like	10 But it's not cowboy boots. I used to wear cowboy
11 a hundred and something dollars a pair.	11 boots years ago.
12 Q. That day, you'd been to see Barbara	12 Q. What kind of boots -- shoes you got on
13 Kitchens' mother, right?	13 today?
14 A. You ought to see them. They're nice work	14 A. These right here are like Stacy Adams.
15 boots. They're new.	15 These are church shoes.
16 Q. And you weren't going to work that day,	16 Q. Okay. And how long have you had those
17 though, were you?	17 shoes?
18 A. But they're my new work boots. I wear	18 A. I've had these here, oh -- I think I got
19 them.	19 them up there at the Goodwill. I've had them about
20 Q. So you just wanted to wear your work boots?	20 six months.
21 A. Yeah, I wanted to wear my --	21 Q. Do you still have a receipt from the day
22 Q. You still got those new work boots?	22 you purchased those shoes?
23 A. Yes, ma'am, I do.	23 A. No, ma'am.
24 Q. All right. So you can provide those work	24 Q. When you were booked into the jail, were
25 boots to your attorney so that we can examine them?	25 you given slippers, like jail-issued slippers?

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1 A. Huh-uh (negative response). They just 2 took -- they took -- didn't give me -- I didn't 3 take a shower or nothing. They put me in there, 4 and they give me -- they did give me some sandals, 5 I recall, like a sandal. They -- what did they 6 give me? They kind of like -- looked kind of like 7 -- a sandal.	1 about dark. So it had to been -- it was pretty 2 dark, because when I went -- arrived at my 3 brother's, it was already dark. Because his wife 4 is the one that took the photos of me.
8 Q. So they made you take off your work boots, 9 right?	5 Q. Whose wife took the photos?
10 A. Yes.	6 A. My brother's.
11 Q. Okay. And so when they made you take off 12 your work boots, they didn't let you take those 13 work boots into the jail cell with you, did they?	7 Q. What's her name?
14 A. No.	8 A. Tina Worley.
15 Q. So they logged them a property log. Is 16 that right?	9 Q. Why was she taking photos?
17 A. Yes, should have.	10 A. She was taking them to prove my injuries 11 and the blood. Looked like I been out of a horror 12 movie.
18 Q. Did you sign that property log?	13 Q. But had you been to the hospital before 14 you were released?
19 A. I don't recall.	15 A. Yes, before, they took me to hospital.
20 Q. Okay.	16 Q. And when you went to the hospital, they 17 didn't clean off any of that blood?
21 A. I don't know. I don't think I did, no.	18 A. No, ma'am.
22 Q. How long were you in jail after that 23 arrest?	19 Q. You didn't ask them to?
24 A. I was in there that night. The next day, 25 I got out that evening. And I want to think it was	20 A. They didn't -- all they done is sewed up 21 my chin. And when I went back in there, they 22 didn't let me have a shower. I asked them if I 23 could get a shower. They put me in Beat 22, and 24 that's where I stayed until all that night. I 25 asked for a shower that morning. "Let me get
1 cleaned up."	Page 89
2 "No. We'll let you when we get ready."	1 bleeding out the ear most all that night.
3 That rocked on until they -- I said, "Have	2 Q. What clothing were you wearing on the day 4 they set me a bond?"
5 "No."	3 you were arrested?
6 Then late that evening about dark is when	4 A. I had a button-down shirt, I recall. It
7 they finally -- the judge set a bond, and I got	5 was black button-down, I recall. And I had blue
8 released.	6 jeans and my work boots. And I think those boots
9 Q. But the nurses that you saw at Grenada 10 hospital, they don't work for the jail, do they?	7 -- I still got them. They got blood on them.
11 A. No.	8 Q. Okay. You haven't worn them since then?
12 Q. But you're saying that those nurses didn't 13 take the time to clean up their patient at all?	9 A. I got them put up. I wanted to keep the
14 A. Just where I got my little -- my 22	10 clothes, also, and put them in a bag, but I didn't
15 stitches.	11 get to do that.
16 Q. So where all did you have blood on you?	12 Q. Why didn't you get to do that?
17 A. I was bloody from head to toe.	13 A. Barb was set on washing them.
18 Q. What was bleeding down on your toes?	14 Q. I'm sorry?
19 A. Jeez, my nose, my mouth, my chin. Yes,	15 A. Barbara washed them.
20 ma'am.	16 Q. Oh, okay. Mr. Worley, how long have you 17 said you lived in Grenada?
21 Q. You were just spitting blood, and they 22 took you back to jail?	18 A. I have lived here now -- I've been -- four
23 A. I wasn't spitting it at that time, but it	19 years.
24 was sure already on me. I still -- when I got	20 Q. Okay.
25 back, I was still bleeding out the ear. I was	21 A. I've been at my spot. I got it paid for.
	22 Q. Have you ever previously lived in Grenada?
	23 A. Years ago, like ten years ago.
	24 Q. And how long did you live in Grenada in 25 that ten-year -- that period ten years ago?

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1	A. Okay. We lived here a couple of years.	1 fish.
2	Q. And so in between -- ten years ago, you	2 Q. Okay.
3	were in Grenada. Then where did you move to?	3 A. I'm a fisher.
4	A. Murray. Back to Kentucky.	4 Q. Where do you fish?
5	Q. Murray, Kentucky? And then how long were	5 A. I fish -- I mean, I like to go to -- my
6	you --	6 best luck is creeks.
7	A. That's where my mothers and sisters --	7 Q. Have you ever threatened anybody with a
8	Q. -- in Murray, Kentucky?	8 gun?
9	A. I been there ever since.	9 A. No. I don't even own a gun.
10	Q. Okay. Murray, Kentucky, and then you came	10 Q. When were you convicted of a felony?
11	back to Grenada. Is that correct?	11 A. Convicted of a felony. That was back in
12	A. That's correct.	12 two thousand -- hold on. Get the date right. It's
13	Q. All right. When were you -- okay. So you	13 2007 -- 2008.
14	lived in Grenada and Murray, Kentucky for the most	14 Q. 2008?
15	part. I mean, Grenada, obviously, we're in the	15 A. Yes.
16	Delta. Hunting's a big thing. Believe or not, I	16 Q. Since you've been back in Grenada, you
17	like to hunt. You might not be able to look at me	17 live with Barbara Kitchens?
18	and tell that. Do you like to hunt?	18 A. Yes.
19	A. I don't care for hunting.	19 Q. So what year would that have been? About
20	Q. You've never been a big hunter?	20 2014 or 2013?
21	A. No.	21 A. Two thousand -- Barbara came to Kentucky
22	Q. Do you own any guns?	22 in two thousand -- I want to say 2011 or '12.
23	A. No.	23 Somewhere right there.
24	Q. Why not?	24 Q. So y'all have been dating since about
25	A. I just -- I'm not a hunter. I love to	25 2011, 2012?
	Page 92	Page 93
1	A. I've dated her prior to this. Back in	1 know, you're saying, "Look, let's work this out."
2	2005.	2 And this lady here, she just -- really I'm just --
3	Q. Now, earlier, you said that you love	3 I don't -- you know, I'm not in love with her,
4	Barbara Kitchens. Isn't that right?	4 she's really not my type of person, I just -- and
5	A. Yes.	5 say I go back with you. Is that cheating?
6	Q. And you said that she's there for you. Is	6 Q. Look, I'm not going to answer any
7	that correct?	7 questions. It's only for me to get your opinion.
8	A. Yes.	8 A. I understand. But that's --
9	Q. But wouldn't you agree that you cheat on	9 Q. I think you got the general -- what people
10	her?	10 believe is cheating. Well, what about a Shirley
11	A. Agree I cheat on her?	11 that you mentioned earlier? Who is the Shirley?
12	Q. (Nods head affirmatively.)	12 A. I don't know a Shirley.
13	A. No, I don't -- I haven't cheated on her,	13 Q. Turn to --
14	no.	14 A. Shirley?
15	Q. What do you call cheating?	15 Q. Turn to the page that's marked as 77.
16	A. I call cheating is kind of -- if, say,	16 A. Shirley.
17	you're my girlfriend, and I'm seeing this lady here	17 Q. At this point we were going back and
18	at the same time, and you have no knowledge of	18 forth, and I believe you mentioned a Shirley or
19	whatsoever, that's cheating. But if me and you	19 someone of that nature, that that was who you were
20	have a dispute, and say me and you break up and	20 dealing with. It was your girlfriend.
21	we're no longer boyfriend and girlfriend, and say I	21 A. On 77?
22	date this lady here, that's not cheating. We're	22 Q. Yes. I believe -- and y'all might have
23	not no longer together.	23 been looking at a different page, but I believe
24	Now, if I date her and I see -- you know,	24 that's --
25	and then here you are, you make contact, and, you	25 A. I believe you're mistaken.

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<p style="text-align: right;">Page 94</p> <p>1 Q. You believe it was on another page? Do 2 you know a Shirley? 3 A. Never heard of a Shirley in my life. I 4 don't even know where that name came from. 5 Q. What about on 81, was that regarding a 6 Shirley? 7 A. No, that's not regarding Shirley. No. 8 Q. Okay. All right. Well, we'll be able to 9 look at the transcript later, so that might help me 10 clear it up. 11 A. Yes, ma'am. 12 Q. Let's talk about when you went to UMC on 13 December 23rd, 2016. And this is the day of the 14 incident. And I'm going to give you a copy. 15 MS. RILEY: We'll make this Exhibit 3. 16 (EXHIBIT 3 WAS MARKED FOR THE RECORD.) 17 MS. RILEY CONTINUED: 18 Q. Mr. Worley, on the day of this incident, 19 on the day you were arrested, December 23rd, you 20 were drinking that day, weren't you? 21 A. Yes. 22 Q. Okay. Would you say you were pretty 23 intoxicated? 24 A. No. 25 Q. Would you say that you were being</p>	<p style="text-align: right;">Page 95</p> <p>1 uncooperative? Let me break that up. Would you 2 say you were being uncooperative with the officers 3 that day? 4 A. No. 5 Q. Would you say you were uncooperative with 6 the medical staff or the nurses that treated you 7 that day? 8 A. No. 9 Q. Okay. You say you weren't very 10 intoxicated on the day of the incident. But if 11 you'll look at page 1 of these UMC records and 12 you'll go down to about the middle of the page, and 13 it says "Laceration," and "Laceration" is bolded 14 and underlined, would you read that first sentence 15 that begins, "The incident occurred"? 16 A. "The incident occurred one to two hours 17 ago. The laceration is located on the face. The 18 laceration is 6 cms in size. The laceration 19 mechanism was blunt object. The pain is mild. The 20 pain has been consistent. He reports no foreign 21 bodies present. His tetanus status is UTD." 22 Q. Okay. So the very first sentence that I 23 asked you to read, it states that the incident 24 occurred "one to two hours ago." So would you 25 agree that that means that incident had occurred</p>
<p style="text-align: right;">Page 96</p> <p>1 one or two hours before you were seen by this 2 nurse? 3 A. That cannot be -- couldn't have been one 4 or two hours. That's impossible. 5 Q. Why is that? 6 A. Because right when it happened, and then 7 after the incident happened, it didn't take one to 8 two hours to get me from Grenada County jail to the 9 hospital. Now, how would that be possible when the 10 hospital's not but, what, five miles? I wonder how 11 -- I would've had to sat there and bled for one and 12 a half hours, Nurse Bibbs would let me bleed. 13 Q. When you got to the emergency room, were 14 you immediately taken in to see the doctor? 15 A. Yes. 16 Q. Okay. They didn't triage you first? 17 A. They took me straight in, laid me back, 18 and it was a male doctor that came in to see me, 19 and a female assistant. 20 Q. Do you have any reason to believe that the 21 doctors or the nurses at UMC Grenada have anything 22 against you? 23 A. Not that I know of, no. 24 Q. Do you have any reason to believe that 25 they would lie about you?</p>	<p style="text-align: right;">Page 97</p> <p>1 A. No. 2 Q. Do you have any reason to believe that 3 there's anything for them to gain by falsely making 4 representations in their medical reports? 5 A. I believe somebody -- mistakes are made -- 6 Q. Okay. 7 A. -- in medical malpractice every day. 8 Q. All right. Well, you also mentioned that 9 you were not very intoxicated and you were very 10 cooperative with the nurses and the officers. 11 That's correct? 12 A. I didn't say I said that I was not un- -- 13 incooperative with the staff at the hospital. I 14 wasn't in -- what are you calling "incooperative"? 15 Q. Were you cooperative with the nurses and 16 the medical staff? 17 A. I am in handcuffs, I am sitting there, and 18 this -- he's giving me medical attention. Why 19 would I refuse? 20 Q. I want you to go to page 2 of those UMC 21 records. 22 A. Yes. 23 Q. If you'll look at the top, it says, 24 "Reason unable to perform ROS," which I'll proffer 25 to you means "Review of Systems." And will you</p>

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<p style="text-align: right;">Page 98</p> <p>1 state the reason that is given by the medical 2 staff? It's at the very top of the page of page 2. 3 If you like, I can help direct you. 4 A. It says, "Reason unable to ROS is, Patient 5 is intoxicated," and it says "very noncooperative." 6 Q. So by the time you got to the hospital, 7 you were still pretty intoxicated to the nurse, 8 and -- 9 MR. CLARKE: Object to the form. 10 MS. RILEY CONTINUED: 11 Q. -- apparently you were not being 12 cooperative. 13 MR. CLARKE: Object to the form. 14 THE WITNESS: I had drank two cups of 15 wine, and we're talking -- that evening, and we're 16 talking now -- from the time I'd left Elliot, 17 you're talking a couple of hours. Two cups of 18 wine? I had wine probably on my breath, probably 19 from -- you know. But I wish they had give me a 20 alcohol test. 21 MS. RILEY CONTINUED: 22 Q. You don't strike me as the wine type. So 23 what kind of wine do you like? 24 A. It was red wine. 25 Q. What kind of red wine?</p>	<p style="text-align: right;">Page 99</p> <p>1 A. It was Vadello -- Vadello? Patello? It's 2 the kind of wine my brother and his wife drinks. 3 Q. Had you been drinking with your brother 4 and his wife that day? 5 A. No. 6 Q. All right. So how were -- where did you 7 get the wine? 8 A. I had bought the wine that prior evening. 9 Q. Okay. Did you share the wine with 10 anybody? 11 A. No. 12 Q. All right. If you'll look on page 3 of 13 those UMC notes. And we're still -- this is 14 medical notes regarding your treatment on December 15 23rd. At the very bottom, there is an 16 indication -- it's called Followup Information, and 17 it notes a Lillian Lorraine, who was a nurse 18 practitioner. Or a Lillian Lorraine Dubard, I 19 believe it is. Do you know who that is? 20 MR. CLARKE: Can I point it out to 21 him? 22 MS. RILEY: Oh, yes. Yes. 23 MS. GRIFFITH CONTINUED: 24 Q. I'm sorry. I didn't realize you weren't 25 seeing it.</p>
<p style="text-align: right;">Page 100</p> <p>1 A. No. 2 Q. You don't know who that doctor is? 3 A. (Shakes head negatively.) 4 Q. Do you remember ever being treated by that 5 doctor or nurse practitioner? 6 A. No. 7 Q. So is it safe to say that if you never 8 followed up -- or you don't know who she is, that 9 in three days, as instructed by the doctors, you 10 never followed up regarding your wounds? 11 A. Correct. 12 Q. Okay. You were also instructed, if you 13 look at page 4, to see someone about the removal of 14 the sutures or the stitches in your chin. Did you 15 do that? 16 A. Yes. 17 Q. Okay. Where did you do that? 18 A. My brother's wife is a nurse, and she took 19 them out. That's what happened, yes. 20 Q. So she did it at home for you? 21 A. Yes, ma'am. 22 Q. And when did she do it? How many days 23 after the incident did she do that at home? 24 A. I want to think it was like ten days. 25 Because those stitches weren't the ones that</p>	<p style="text-align: right;">Page 101</p> <p>1 dissolved. It was the ones you have to -- you have 2 to clip them and pull them. 3 Q. And what was your brother's wife's name? 4 A. Tina Worley. 5 Q. Tina Worley. And where did you say she 6 was a nurse? 7 A. Batesville Hospital. She's been a nurse 8 for 30 some-odd years. Thirty-five years. 9 Q. Do you remember what kind of tools she had 10 to use to remove those stitches? 11 A. Yes. She's got regular doctor's -- she's 12 got all of her stuff. 13 Q. Okay. So would you say it was scissors or 14 a knife? 15 A. No, it was like the little scissors and 16 tweezers, and you grab them and pull them. 17 Q. Okay. Did she use any type of anesthetic 18 or anything? 19 A. Afterwards, just -- I put Neosporin. 20 Q. Okay. All right. And we're going to keep 21 going in the same document. I'm going to tell you, 22 at the bottom of that same page we're on, on page 23 4, that starts a new date of treatment. You'll see 24 it's 12/28/16. So four days later, you were seen 25 again at UMC Grenada, on December 28th, 2016. Do</p>

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<p>1 you see where I'm starting at?</p> <p>2 A. Yes. That's when I was hurting.</p> <p>3 Q. All right. If you look there, and it says</p> <p>4 that you had had a previous bilateral jaw fracture</p> <p>5 from a car wreck.</p> <p>6 A. Yes. Years ago, when I was 16.</p> <p>7 Q. Okay. Tell me about that.</p> <p>8 A. Well, I was 16 years old, and I had an accident, a car accident, and broke my jaw, and had it all -- this is all -- it's all like rods. It got pushed all the way back. My two teeth used to be perfectly straight, but it knocked my jaw back, and I got steel -- all this is steel (indicating jaw). And after this happened, I thought something bad -- he'd knocked something -- one of these pins a loose out of my jaw.</p> <p>17 Q. Did you tell the doctor that?</p> <p>18 A. Yes. And he got to looking and checked me out. He said, "Richard, what has probably happened, it's the bruising." He told me, "You're going to be okay." He kind of -- and it was kind of popping, but now it's gotten better. It was popping. My jaws were popping. Like you could hear the rod.</p> <p>25 Q. Okay. So were you driving during this car</p>	<p>1 accident?</p> <p>2 A. No, ma'am.</p> <p>3 Q. Who was driving?</p> <p>4 A. My mother.</p> <p>5 Q. Where did it happen?</p> <p>6 A. It happened on 94 East.</p> <p>7 Q. And that is where?</p> <p>8 A. Murray, Kentucky.</p> <p>9 Q. Did that accident involve another driver?</p> <p>10 A. No.</p> <p>11 Q. Well, excuse me, that's a bad question.</p> <p>12 Did it -- was there another vehicle besides the one your mother was driving?</p> <p>14 A. No.</p> <p>15 Q. How did the accident occur?</p> <p>16 A. The accident occurred as we came around the curve there on that straightaway. And a 16-year-old -- the door wouldn't never -- sometimes that door would open, and you'd close it, and sometimes it wouldn't. Sometimes it would just come open. And it came open, and I fell out. My sister was in the van with us. It was like one of those little minivans, but it was a old van.</p> <p>24 Q. So you just fell out of the side of --</p> <p>25 A. I fell out of it. Sure did.</p>
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<p>1 Q. You didn't have your seatbelt on?</p> <p>2 A. Didn't have my seatbelt on. And missed a road sign by about from here to that wall. It would have cut my head off.</p> <p>5 Q. All right. Was any law enforcement called out to the scene?</p> <p>7 A. The ambulance. Mama got on the phone and got the ambulance out.</p> <p>9 Q. Where did the ambulance take you?</p> <p>10 A. Took me to Murray-Calloway County Hospital.</p> <p>12 Q. Murray-Calloway?</p> <p>13 A. (Nods head affirmatively.)</p> <p>14 Q. Is it still, to your knowledge, called the Murray-Calloway County Hospital?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you remember who your doctor was at Murray?</p> <p>19 A. No, I don't.</p> <p>20 Q. What kind of treatment did you receive?</p> <p>21 A. Basically, they just wired my mouth shut. I was young. I don't -- I don't recall what the procedures...</p> <p>24 Q. You mentioned you got metal rods and stuff in there. How did they get those in there?</p>	<p>1 A. They -- you have to find out from the doctor.</p> <p>3 Q. They didn't do surgery?</p> <p>4 A. Yeah, they -- yeah. I was out. You know, they put me unconscious and fixed my face. I know I kept my mouth -- I had to eat through a straw for over nine -- ten weeks. I was like 15, 14 or 15, something like that. I was young.</p> <p>9 Q. All right. Have you had any troubles since you were 16 regarding that incident?</p> <p>11 A. Huh-uh (negative response).</p> <p>12 Q. Okay. Have you ever followed up with anybody regarding that incident and that treatment?</p> <p>14 A. No, ma'am.</p> <p>15 Q. When you -- when they readjusted your jaw, did they know -- do you know if they had to replace any of your teeth with false teeth or --</p> <p>18 A. No, none of that.</p> <p>19 Q. -- just kind of fillers?</p> <p>20 A. The only thing that's different, I had a perfect -- my teeth were perfect. I never had an overbite. Now my front overbites my bottom. That's the only thing different. It's just -- I got little bit of an overbite on my top. That's the only thing</p>

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1 different. They were just aligned perfect. It 2 just knocked my back jaw back about a half a inch. 3 Q. Okay. All right. If you'll put your 4 finger on that page, on page 4, and hold it, and -- 5 because we're going to -- we're going to turn back 6 there in just a second. But if you'll flip all the 7 way to the very front. 8 A. Back to the very front? 9 Q. Uh-huh. And look at page 1. On page 1, 10 in that same sentence -- excuse me. Underneath the 11 paragraph that you read to me earlier, you state 12 that -- well, it states that "Patient was in an 13 altercation and then fell with resultant cut under 14 his chin." That was one claim. Two, a swollen 15 bloody nose. And three, that one tooth was 16 loosened. 17 MR. CLARKE: Object to the form. 18 MS. RILEY CONTINUED: 19 Q. Do you have any reason to understand or 20 know why the medical staff or the doctor didn't 21 make any mention that you complained of a jaw 22 problem? 23 MR. CLARKE: Object to the form. 24 THE WITNESS: I did not have -- I 25 didn't have a jaw problem I noticed that night.	1 MS. RILEY CONTINUED: 2 Q. That night while you were still in the 3 jail? 4 A. I didn't. I didn't notice nothing. This 5 was in -- two days later, I noticed a -- 6 Q. So you noticed -- 7 A. After the swelling, you know -- 8 MR. CLARKE: Let him finish. 9 THE WITNESS: Took swelling -- after 10 the swelling proceeded, I could tell something, you 11 know, wasn't right with my mouth. 12 MS. RILEY CONTINUED: 13 Q. So let me get this straight. At the 14 doctor on 12/23, you didn't notice the jaw pain. 15 Is that correct? 16 A. No. That's correct. 17 Q. And then that night when you were at the 18 jail, you didn't notice the jaw pain? 19 A. No. I been hit -- I been hit before. I 20 have been hit before. I never -- you know, I 21 thought it was swelling. You know, I could tell I 22 was sore, very sore. But I didn't know. 23 Q. Well, let's talk about -- 24 A. I just wanted to have it checked out 25 because I knew that -- I wanted to have it checked
1 out because I knew what I had in my mouth. I know 2 my body. I wanted to make sure nothing was broke 3 a loose. 4 Q. Well, let's talk about four days later, 5 when you finally did report this jaw pain. You see 6 at the bottom of page 4 is the first time that I 7 have in any records that you complained of right 8 jaw pain. Are there any other records out there 9 where you went and sought treatment for right jaw 10 pain? 11 A. Not that I know of. None whatsoever. 12 Q. All right. If you'll turn to page 7. And 13 this is still in regards to your treatment on 14 December 28th. Let me ask you this first: How did 15 you get to the hospital, Grenada UMC, on December 16 28th? 17 A. Barbara drove me. 18 Q. She drove you there? 19 A. (Nods head affirmatively.) 20 Q. Okay. Why did you go to the emergency 21 room? 22 A. I have no insurance. 23 Q. Okay. If you'll see there in about the 24 middle of page 7, it says -- once again, it 25 instructs you to follow up. Do you see where I'm	1 talking about in the middle of the page? 2 A. (Nods head affirmatively.) 3 Q. And it's a Richard C. Reid, a Dr. Richard 4 C. Reid. Do you know who that doctor is? 5 A. No, I don't. I don't know any -- no. 6 Q. So just based on the fact that you don't 7 know who that doctors is, is it safe to say you did 8 not follow up? 9 A. Correct. I have no insurance, no way to 10 pay this doctor. And they will not take you unless 11 you have insurance or some type of medical to pay 12 for it. And it's like \$165 for the visit, and I 13 just don't have the money. 14 Q. Mr. Worley, have you ever been civilly 15 committed? And I don't mean -- before you answer, 16 do you understand what I'm asking when I ask that? 17 Do you know what civil commitment is? 18 A. Civil commitment? 19 Q. Uh-huh (affirmative response). 20 A. Civil -- it's attorneys -- is it making a 21 commitment? 22 Q. No. Okay. So have you ever been -- have 23 you ever received mental health -- 24 A. No. 25 Q. -- treatment or anything like that?

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Page 110	Page 111
1 A. Never.	1 friend of mine, Dr. Wes Mills, and he told me that
2 Q. Just rehab, right?	2 if that tooth was knocked back to my gum -- and
3 A. Right.	3 which I put it back. Put in place with my finger
4 Q. And you only went to rehab one time?	4 and got it pushed -- and pushed it back up in
5 A. Yes.	5 there.
6 Q. Now, is that one time in Kentucky, or one	6 He told me to go to the dentist to make
7 time your entire life?	7 sure there's no nerve damage and make sure it's not
8 A. I've never -- you're right, one time in	8 broke from the root, because it could die and turn
9 Kentucky.	9 yellow. And he said that tooth will die, and he
10 COURT REPORTER: One time -- I'm	10 says, "You need to go check your tooth out." And
11 sorry?	11 that's -- and it was real -- still real loose.
12 THE WITNESS: One time in Kentucky,	12 Q. And which -- who told you to go have the
13 yes, ma'am.	13 -- it checked out by the dentist?
14 (OFF THE RECORD.)	14 A. Dr. Wes Mills.
15 MS. RILEY CONTINUED:	15 Q. Dr. Wes Mills. And where was he a doctor?
16 Q. All right. Let's talk about Ware Family	16 A. He's a doctor in Mayfield, Kentucky.
17 Dental. When did you go to Ware Family Dental?	17 Q. When did you see him?
18 A. That -- when I seen the dentist?	18 A. I didn't see him. I called him. I've
19 Q. Uh-huh (affirmative response).	19 done all his work. I've worked for him for a few
20 A. That was Barbara's dentist. She's the one	20 years. I mean, his wife, they're very good friends
21 that referred those. I seen -- went there because	21 with me.
22 Barb does her dentures through there, has her	22 Q. And I'm going to ask you one last time.
23 dental work done.	23 What was his name again? I'm sorry.
24 Q. Okay. Why did you go to that dentist?	24 A. Dr. Wes Mills, M-i-l-l-s.
25 A. I contacted a dentist in Kentucky, a good	25 Q. And do you have his phone number?
Page 112	Page 113
1 A. I do at home.	1 A. They give me a piece of paper -- this
2 Q. So if I ask you to get it to your --	2 piece of paper when I went to them, when I left
3 A. Yes.	3 there.
4 Q. -- attorney, will you get it?	4 Q. All right. You see on there that it says
5 A. Yes, of course.	5 that you have no infection. Is that correct?
6 MS. RILEY: I apologize. I'm having	6 A. Uh-huh (affirmative response).
7 a little trouble finding those Ware records. Give	7 Q. And if you look at the very bottom of the
8 me just a second.	8 page, the handwriting says, "No treatment is
9 (OFF THE RECORD.)	9 needed." Is that correct?
10 MS. RILEY: I'm going to have this	10 A. Yes.
11 marked as --	11 Q. Did you hear what I said? I know your
12 MR. CLARKE: This is my copy. We can	12 counsel is --
13 make a copy.	13 A. Yes.
14 MS. RILEY: Yeah. As Exhibit 4.	14 Q. So I'm going to repeat my question. I
15 (EXHIBIT 4 WAS MARKED FOR THE RECORD.)	15 want to make sure and be fair. It says at the
16 MS. RILEY CONTINUED:	16 bottom of that page, "No treatment is needed." Did
17 Q. All right. Mr. Worley, have you ever seen	17 I read that correctly?
18 the two pages I just handed to you?	18 A. Yes.
19 A. Uh-huh (affirmative response).	19 Q. So since there was no treatment needed,
20 Q. Is that your entire dental record from the	20 did you follow up with any other dentist regarding
21 Ware Family Dental?	21 that tooth?
22 A. Uh-huh (affirmative response).	22 A. No.
23 Q. You're sure?	23 Q. So who's your regular dentist?
24 A. As far as I know.	24 A. Do not have one.
25 Q. How did you get those records?	25 Q. When was the last time you had gone to the

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<p style="text-align: right;">Page 114</p> <p>1 dentist before this December 27th visit?</p> <p>2 A. Back when I was just a kid.</p> <p>3 Q. Okay. In your complaint, you stated that</p> <p>4 you're seeking damages for emotional distress,</p> <p>5 various forms of emotional distress. What</p> <p>6 emotional distress are you referring to?</p> <p>7 A. My emotional distress I'm referring to is</p> <p>8 just, I -- I don't feel comfortable going out into</p> <p>9 public. I don't feel comfortable leaving my home</p> <p>10 anymore. I don't want to go out. And, you know, I</p> <p>11 used to go out by myself and knocking on doors. If</p> <p>12 I see something needed done, I'd pass out cards,</p> <p>13 leaving cards at stations, at stores.</p> <p>14 I mean, I'd go as far as Greenville,</p> <p>15 Greenwood. I don't even want to -- I've had</p> <p>16 Ms. Sue and Mr. Jimmy Lewis begging me to come to</p> <p>17 Greenwood. They -- I've built a pool house in the</p> <p>18 past for them. I built the decks all the way</p> <p>19 around it. I put a fence around their -- I don't</p> <p>20 even want to go down to Greenwood and do any work</p> <p>21 for them. They've been begging me for the last two</p> <p>22 months, and she said, "Richard, I'll never find</p> <p>23 anybody like you to work."</p> <p>24 I said -- you know, I just don't feel</p> <p>25 comfortable. I don't.</p>	<p style="text-align: right;">Page 115</p> <p>1 Q. Did you seek any --</p> <p>2 A. And I'm a worker.</p> <p>3 Q. Did you seek any medical -- did you go see</p> <p>4 a counselor regarding these feelings?</p> <p>5 A. Again, everybody wants money that I don't</p> <p>6 have.</p> <p>7 Q. So that's a no, you didn't go see a</p> <p>8 counselor?</p> <p>9 A. No.</p> <p>10 Q. Did you go see a psychiatrist?</p> <p>11 A. No.</p> <p>12 Q. Did you ask to see a psychiatrist or some</p> <p>13 type of counselor when you were in the emergency</p> <p>14 room on either of those two dates?</p> <p>15 A. No.</p> <p>16 Q. So to date, you don't have any bills from</p> <p>17 where you went to see some type of medical</p> <p>18 physician or counselor?</p> <p>19 A. No, whatsoever, I don't.</p> <p>20 Q. How many fights have you been in since --</p> <p>21 let's just go with the last ten years.</p> <p>22 A. Ten years? I would say in ten years,</p> <p>23 four. Four altercations. You're saying fights.</p> <p>24 Four.</p> <p>25 Q. Well, we talked about at least four today.</p>
<p style="text-align: right;">Page 116</p> <p>1 Are you sure that's the only four you've been in?</p> <p>2 MR. CLARKE: Object to the form.</p> <p>3 THE WITNESS: Four fights. Not</p> <p>4 arguments.</p> <p>5 MS. RILEY CONTINUED:</p> <p>6 Q. All right. How many physical fights have</p> <p>7 you been in?</p> <p>8 A. Four.</p> <p>9 Q. Four? And so when were those?</p> <p>10 A. Those were -- one was with the -- you</p> <p>11 showed the paper earlier. What is that neighbor's</p> <p>12 name? Oh -- down the road. I say -- what's his</p> <p>13 name? I'm trying to think of the fellow's name.</p> <p>14 Oh, me. It's on that paperwork you had earlier.</p> <p>15 Q. Okay.</p> <p>16 A. One was him. That was in 2016. One</p> <p>17 was. . . And then Bubba Roach. That was. . . And</p> <p>18 then there was two more. I can't recall their</p> <p>19 names or dates.</p> <p>20 Q. How many times have you been charged with</p> <p>21 resisting arrest?</p> <p>22 A. Twice. This time, this incident, and</p> <p>23 there's one other incident.</p> <p>24 Q. How many times have you been found guilty</p> <p>25 of resisting arrest?</p>	<p style="text-align: right;">Page 117</p> <p>1 A. I don't recall. I believe this time here</p> <p>2 was dismissed on the resisting arrest. I'm</p> <p>3 thinking, now. My lawyer had to tend to resisting</p> <p>4 arrest because I didn't resist. I think I told him</p> <p>5 I wasn't going to plead to no resisting because I</p> <p>6 didn't resist. And I'm not -- I'm pretty sure of</p> <p>7 that.</p> <p>8 Q. What about the other time that you were --</p> <p>9 A. The other time, I pled guilty.</p> <p>10 Q. Okay. And when was that?</p> <p>11 A. Shoo. Let me think. Back in nineteen</p> <p>12 ninety. . . I want to say 2001.</p> <p>13 Q. Who was the arresting law enforcement</p> <p>14 agency?</p> <p>15 A. It was Shelby County. No, no, it wasn't.</p> <p>16 That was Tipton County, Tennessee.</p> <p>17 Q. How many times have you been arrested</p> <p>18 by --</p> <p>19 MS. RILEY: Let's go off the record</p> <p>20 for a second.</p> <p>21 (OFF THE RECORD.)</p> <p>22 MS. RILEY CONTINUED:</p> <p>23 Q. How many times have you been arrested by</p> <p>24 Sonja Crump, also Sonja Willis? Same person.</p> <p>25 A. Three times.</p>

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<p style="text-align: right;">Page 118</p> <p>1 Q. That's it?</p> <p>2 A. Maybe four, that I know -- yes, four times.</p> <p>3 Q. Is that four times in the last two years,</p> <p>4 or four times --</p> <p>5 A. No. That's four times in my lifetime.</p> <p>6 Q. Four times in your lifetime. What about</p> <p>7 Danny Lawrence, how many times have you been</p> <p>8 arrested by Danny Lawrence?</p> <p>9 A. This will make twice.</p> <p>10 Q. In your lifetime?</p> <p>11 A. Lifetime. One was just an old -- was just</p> <p>12 some type of --</p> <p>13 COURT REPORTER: I'm sorry?</p> <p>14 THE WITNESS: The first was a failure</p> <p>15 to pay, or something, a fine. And then this.</p> <p>16 MS. RILEY CONTINUED:</p> <p>17 Q. How many times have you been arrested by</p> <p>18 Deputy Bryant Griffin?</p> <p>19 A. Never.</p> <p>20 Q. How many times have you been arrested by</p> <p>21 Deputy Randy Sweat?</p> <p>22 A. I don't recall ever being arrested by</p> <p>23 Mr. Sweat.</p> <p>24 Q. How many times have you been arrested for</p> <p>25 assault?</p>	<p style="text-align: right;">Page 119</p> <p>1 A. In my lifetime?</p> <p>2 Q. (Nods head affirmatively.)</p> <p>3 A. Since I -- since -- I'd say probably, say</p> <p>4 -- like I said, say, under the influence, and I was</p> <p>5 drinking, and my behavior was wrong, and I could</p> <p>6 have walked away, tried to get away, run away. I'd</p> <p>7 say seven, eight times.</p> <p>8 Q. About seven, eight times in your lifetime?</p> <p>9 A. Yeah, yeah. Arrested for it, yes.</p> <p>10 Q. How many times have you been arrested or</p> <p>11 charged with assault of a law enforcement officer?</p> <p>12 A. Arrested and charged? Never.</p> <p>13 Q. Never?</p> <p>14 A. No. Not assaulting a law officer. Never.</p> <p>15 Q. When was the very last time you were</p> <p>16 arrested?</p> <p>17 A. December the 23rd.</p> <p>18 Q. And on December 23rd, it's your testimony</p> <p>19 that you never became violent with any of the</p> <p>20 officers?</p> <p>21 A. No, ma'am, I did not.</p> <p>22 Q. You never told Deputy Griffin that you</p> <p>23 were going to kill him?</p> <p>24 A. No.</p> <p>25 Q. You never told Deputy Griffin that before</p>
<p style="text-align: right;">Page 120</p> <p>1 you killed him, you were going to make him suck</p> <p>2 your penis?</p> <p>3 A. No.</p> <p>4 Q. You never kicked him in the groin?</p> <p>5 A. No. I would have been charged with</p> <p>6 assault on a police officer if I'd done that.</p> <p>7 Q. Weren't you charged with assault on a</p> <p>8 police officer in this incident?</p> <p>9 A. No. Whatsoever. They thought this up</p> <p>10 after the fact. It's all a dream.</p> <p>11 Q. Oh, the officers have --</p> <p>12 A. They dreamed this -- they dreamed it up, I</p> <p>13 promise. Swear under oath, God strike me dead,</p> <p>14 it's a lie.</p> <p>15 Q. Okay. Did you attempt to run from any of</p> <p>16 the officers?</p> <p>17 A. I've never had a fleeing in my life. I'm</p> <p>18 not -- run? I have nothing to run for. Had \$800</p> <p>19 on me, cash. What am I going to run for? Over a</p> <p>20 public drunk? Run?</p> <p>21 MR. CLARKE: Just answer the</p> <p>22 questions.</p> <p>23 THE WITNESS: No.</p> <p>24 MS. RILEY CONTINUED:</p> <p>25 Q. So on December the 23rd, you never ran</p>	<p style="text-align: right;">Page 121</p> <p>1 from the officers?</p> <p>2 A. No, ma'am.</p> <p>3 Q. Or attempted to run from the officers?</p> <p>4 A. No, ma'am.</p> <p>5 Q. Have you ever threatened to kill Danny</p> <p>6 Lawrence?</p> <p>7 A. No, ma'am.</p> <p>8 Q. You said something earlier, and I meant to</p> <p>9 -- we were talking about your treatment of your</p> <p>10 teeth at Ware's dental office. You mentioned</p> <p>11 earlier that your tooth was chipped. Are you</p> <p>12 saying your tooth was chipped in this incident?</p> <p>13 A. (Nods head affirmatively.)</p> <p>14 Q. Which tooth?</p> <p>15 A. That piece right there chipped.</p> <p>16 Q. One of your front teeth?</p> <p>17 A. Front tooth, yes, ma'am.</p> <p>18 Q. Did you report that to your dentist at</p> <p>19 Ware Dental?</p> <p>20 A. I showed him, yes.</p> <p>21 Q. Did he do anything about it?</p> <p>22 A. Huh-uuh (negative response). I don't have</p> <p>23 the -- they said they can go in and put a -- you</p> <p>24 know, that stuff and fix the tooth. I don't have</p> <p>25 the money to do it.</p>

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<p>1 Q. Okay. You mentioned that it had a dead 2 feeling in it. 3 A. Uh-huh (affirmative response). 4 Q. Have you done anything about that? 5 A. Huh-uh (negative response). 6 Q. Have you ever threatened to blow Sonja 7 Willis's brains out with a gun? 8 A. No. 9 Q. In your complaint, you make claims that 10 you weren't allowed to say things, your rights to 11 free speech were violated. What free speech were 12 you not allowed to say? 13 MR. CLARKE: Object to the form. 14 That's not what the complaint says. 15 MS. RILEY CONTINUED: 16 Q. Do you -- 17 A. I don't recall. I do not recall that. 18 Q. Don't you claim that you were retaliated 19 against for your free speech, for saying things? 20 A. No, just beating. They just give me a 21 beating. 22 Q. Okay. 23 A. That's what they did. 24 Q. And that wasn't because of -- in 25 retaliation for your free speech?</p>	<p>1 A. I never. . . 2 Q. Was that a no? 3 A. Over some donuts, if that's what he felt 4 he wanted to do, because I asked him about the 5 donuts at a donut shack. If he wanted to -- 6 apparently they -- law enforcement -- Mr. Griffin 7 had something against donuts. 8 Q. So you believe that Mr. Griffin retaliated 9 against you because you made that statement? 10 A. No, I don't. I believe that it was all a 11 setup deal. I believe that Sonja Willis had told 12 Mr. Griffin to beat me, is what I believe to my 13 heart and soul. And I believe that's the reason I 14 incurred this beating. 15 Because I didn't know this man. I've 16 never spoke to this man. For him to come out of 17 the blue and to issue that to me. . . I have not 18 had any other problems with any other deputies in 19 this county except Sonja. 20 Q. What problems have you had with Sonja? 21 A. Arresting me for these false arrests. And 22 I sat in jail nine months, and everything gets 23 dismissed. And then she went and filed -- when she 24 came to my house and filed charges on me. Went to 25 court, and they just threwed it out, "Richard, go</p>
<p>1 home." And I believe she just retaliated with 2 Mr. Griffin, and he issued me what she told him to. 3 That's what I believe, and that's just. . . 4 Q. Why do you believe that Sonja and 5 Mr. Griffin teamed up? I mean, why -- 6 A. That's what I believe. 7 Q. Where do you get that belief? 8 A. That's the only -- I do not know this 9 deputy from nowhere. He had no -- no -- I don't 10 believe he had no -- he had no reason to do that to 11 me. 12 Q. What basis do you have or what evidence do 13 you have that Sonja told Mr. Griffin to go beat you 14 up? 15 A. I have none. It's my -- it's what I 16 believe. 17 Q. All right. 18 A. There was a reason. I do not -- I've 19 never met this man. And, you know, that's just my 20 belief. 21 Q. Was Sonja Wilson there that day? 22 A. No, she was not. 23 Q. When was the last time you saw Sonja 24 Wilson before December 23rd? 25 A. The day that she came to my property.</p>	<p>1 Q. When was that? 2 A. I told her to leave. That was -- I cannot 3 recall the correct date at this time. It's in the 4 paperwork. 5 Q. In your complaint, you make a claim for 6 lost wages. What lost wages? 7 A. What lost wages? 8 Q. (Nods head affirmatively.) 9 A. If I was out working -- there's not a 10 number on the wages I have lost. I cannot put a 11 number. If I'd been out working, mentally stable 12 to climb these ladders and get out here and mingle 13 with the public -- I have lost in the past couple 14 of years over this thousands and thousands of 15 dollars. 16 Q. You also claim lost earning capacity. 17 What do you mean by that? 18 A. My functioning. I'm just -- I don't have 19 the mental capacity to deal with the public, to -- 20 I don't have the mental capacity to leave my house, 21 to feel -- I'm out of my comfort zone. I'm just -- 22 I don't want to go anywhere. How else can I 23 explain it? I don't want to leave the house. I 24 don't want to go out. I'm better off, I feel safer 25 at home. It's --</p>

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<p style="text-align: right;">Page 126</p> <p>1 Q. But didn't you say to us --</p> <p>2 A. If I could build a fence around it, it</p> <p>3 would be more better.</p> <p>4 Q. Didn't you say to us today that you're</p> <p>5 getting ready to get in your car tomorrow and drive</p> <p>6 all the way from here to Kentucky?</p> <p>7 A. I would feel a lot safer in the state of</p> <p>8 Kentucky away from here. I wouldn't feel</p> <p>9 threatened. I feel -- right here, I feel</p> <p>10 threatened.</p> <p>11 MS. RILEY: Okay. All right. That's</p> <p>12 all the questions I have.</p> <p>13 MR. CLARKE: I have one followup.</p> <p>14 EXAMINATION</p> <p>15 BY MR. CLARKE:</p> <p>16 Q. If you look at Exhibit No. 3, Mr. Worley.</p> <p>17 A. Yes, sir.</p> <p>18 Q. That's it right there. Not this.</p> <p>19 MR. CLARKE: We'll have to make a</p> <p>20 copy of this and -- pull that out and mark it as</p> <p>21 Exhibit 4.</p> <p>22 MR. CLARKE CONTINUED:</p> <p>23 Q. Go to the first page. You were asked to</p> <p>24 read some stuff by --</p> <p>25 MR. CLARKE: I apologize, what's your</p>	<p style="text-align: right;">Page 127</p> <p>1 name again?</p> <p>2 MS. RILEY: "Defense counsel" is fine</p> <p>3 on the record.</p> <p>4 MR. CLARKE: Okay. Defense counsel.</p> <p>5 MR. CLARKE CONTINUED:</p> <p>6 Q. If you look at the first page -- the first</p> <p>7 page, at the top, it says -- do you see where it</p> <p>8 says, "The history is provided by the patient and</p> <p>9 the police"?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Okay. Go to the fourth page, before the</p> <p>12 treatment for March 28th, 2016. The last line,</p> <p>13 where it says, "Patient states," if you'll read</p> <p>14 that.</p> <p>15 A. "Was assaulted on 12/23, had previous</p> <p>16 bilateral jaw" --</p> <p>17 Q. No, no. Look at the -- that's on 12/28.</p> <p>18 Look at the line above that. What did it -- what</p> <p>19 did you state? Here is the next day. This is the</p> <p>20 end of 12/23. What did you state?</p> <p>21 A. "Patient states, 'They beat the s--t out</p> <p>22 of me' . . . by the PD."</p> <p>23 Q. All right. Did you -- when you drafted --</p> <p>24 when you filed your lawsuit, do you know what the</p> <p>25 requirements are for a First Amendment case? You</p>
<p style="text-align: right;">Page 128</p> <p>1 were asked about your complaint.</p> <p>2 A. Yes, sir.</p> <p>3 Q. In the lawsuit. Did you go to a lawyer to</p> <p>4 make allegations based on what you told him?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know what a First Amendment</p> <p>7 violation is?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you know what a Fourth Amendment</p> <p>10 violation is?</p> <p>11 A. No, sir.</p> <p>12 Q. Did you just provide facts to your</p> <p>13 attorney to file a complaint?</p> <p>14 A. Yes, sir.</p> <p>15 MR. CLARKE: That's all I have.</p> <p>16 MS. GRIFFITH: I have a few followup.</p> <p>17 FURTHER EXAMINATION</p> <p>18 BY MS. GRIFFITH:</p> <p>19 Q. On page 7 of that same exhibit.</p> <p>20 MR. CLARKE: Exhibit 3?</p> <p>21 MS. GRIFFITH: Yes, Exhibit 3.</p> <p>22 MS. GRIFFITH CONTINUED:</p> <p>23 Q. When you went back on 12/28 to the ER, it</p> <p>24 looks like they prescribed you some medication.</p> <p>25 Did you fill that medication?</p>	<p style="text-align: right;">Page 129</p> <p>1 A. Yes, I did.</p> <p>2 Q. And what pharmacy do you use?</p> <p>3 A. I think Walgreens.</p> <p>4 Q. Is that here in Grenada?</p> <p>5 A. Uh-huh (affirmative response).</p> <p>6 MR. CLARKE: You've got to say yes or</p> <p>7 no.</p> <p>8 THE WITNESS: Yes.</p> <p>9 MS. GRIFFITH CONTINUED:</p> <p>10 Q. And did you complete taking that</p> <p>11 medication?</p> <p>12 A. Yes.</p> <p>13 Q. What was it for?</p> <p>14 A. That was just for -- it was like for</p> <p>15 swelling and like a -- it keeps your muscles, you</p> <p>16 know, as far as -- like swelling and stuff is</p> <p>17 basically what it was for.</p> <p>18 Q. So was it a form of pain medication?</p> <p>19 A. No, it's not really a pain -- it didn't</p> <p>20 strike me as a pain medication. It was more of a</p> <p>21 muscle -- like a muscle relaxer. You could kind of</p> <p>22 -- it keeps, you know, from -- just swelling down</p> <p>23 and stuff that was all in my face.</p> <p>24 Q. You mentioned that you've lost thousands</p> <p>25 of dollars in lost wages. Do you have any tax</p>

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1 returns from 2015?	1 A. Yes. I'm a Christian.
2 A. Yes.	2 Q. Where do you go to church?
3 Q. And approximately what did you make that	3 A. I serve my Lord at home. I can talk to
4 year?	4 Him right here with you-all. Wherever there's one
5 A. 2015, it was right at 80. And I also got	5 or two more people, God is there.
6 to pay some -- the IRS. 80 -- around \$80,000.	6 Q. But you don't go, say, to --
7 Q. How much did you make in 2014?	7 A. I haven't been -- I don't belong to a
8 A. That was a slow year. Around 30.	8 church here in Grenada County. No, I don't. I was
9 Q. What would you say in 2013?	9 saved and baptized at Mt. Carmel Baptist in New
10 A. 2013, it was around 48.	10 Concord, Kentucky.
11 Q. Do you think that you might not remember	11 Q. So have you ever seen and spoken to a
12 some of the things that perhaps you did on 12/23 of	12 preacher about this emotional distress that you're
13 '16 because you were drunk?	13 claiming?
14 A. No. Not no, but no whatsoever. I	14 A. No, I haven't. But I have put it in God's
15 remember everything to the correct moment I took	15 hands.
16 the first blow to the last.	16 MS. GRIFFITH: I don't have anything
17 Q. Do you think that maybe you no longer feel	17 further. Thank you.
18 comfortable going out in the public or going out to	18 (DEPOSITION CONCLUDED APPROXIMATELY 1:30 P.M.)
19 work because you aren't really getting drunk any	19 (READING AND SIGNING IS NOT WAIVED.)
20 longer?	20
21 A. No.	21 ORIGINAL: MARY MCKAY GRIFFITH
22 Q. Did you ever see --	22 COPIES: ANDREW CLARKE
23 A. I don't -- I don't go in the public drunk.	23 KATELYN RILEY
24 I do that at home.	24
25 Q. Do you go to church?	25
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1 CERTIFICATE OF REPORTER	1 CERTIFICATE OF DEPONENT
2 I, BETHANY CAMMACK, Certified Shorthand	2
3 Reporter and Notary Public for the State of	3 I, _____, do hereby
4 Mississippi, do hereby certify that the above and	4 certify that the foregoing testimony is true and
5 foregoing pages contain a full, true and correct	5 accurate to the best of my knowledge and belief, as
6 transcript of the proceedings, as taken by me at	6 originally transcribed, or with the changes as
7 the time and place indicated, and later reduced to	7 noted on the attached Correction Sheet.
8 typewritten form under my supervision and to the	8
9 best of my skill and ability.	9 (SIGNATURE)
10 I further certify that I placed the	10
11 witness under oath to tell the truth and that all	11
12 answers were given under that oath. I further	12
13 certify that the witness has chosen the right to	13
14 not waive the reading and signing of the deposition.	14
15 I further certify that I am not in the	15 Subscribed and sworn to before me this the
16 employ of or related to any counsel or party in	16 day of _____, 2018.
17 this matter, and have no interest, monetary or	17
18 otherwise, in the final outcome of this case.	18 My Commission Expires:
19 Witness my signature and seal this	19
20 the 27th day of August, 2018.	20
21	21 (NOTARY PUBLIC)
22	22
23	23
24	24
25	25



BETHANY CAMMACK, CSR

CSR NO. 1526

My Commission Expires May 1, 2019

844.533.DEPO

EXHIBIT A - DEPOSITION OF RICHARD WORLEY

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CORRECTION SHEET

I, _____, do hereby
certify that the following corrections and
additions are true and accurate to the best of my
knowledge and belief.

PAGE: LINE: SHOULD READ: REASON FOR CHANGE:

9

10

11

12

13

14

15

16

17

18

(SIGNATURE)

19

Subscribed and sworn to before me this the
day of _____, 2018.

22

23 My Commission Expires:

24

25

(NOTARY PUBLIC)

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